



Campus Institutional Review Board
University of Missouri-Columbia

Assessing the Level of Risk

Policy Number 2876.27

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Effective Date: December 12, 2007

Approval Authority:

A handwritten signature in black ink, appearing to read 'ChMBLi', written over a horizontal line.

Signed
IRB Chair

Date December 12, 2007

Institutional Approval:

A handwritten signature in black ink, appearing to read 'R. J. Hall', written over a horizontal line.

Signed
Associate Vice-Chancellor for Research

Date December 12, 2007

1.0 Policy

The Campus Institutional Review Board (Campus IRB) assures that all human subject research activities conducted at the University of Missouri-Columbia will receive a prospective comprehensive review at a level that appropriately assesses the reasonable risk-benefit ratio to subject participants.

2.0 Scope

All human subject research participants deserve protection of their rights and welfare through a comprehensive level of review appropriate to the risks of the proposed research activities. The Campus IRB strives to appropriately categorize the level of review to the proposed project, and applies these processes to all human subject research conducted under its jurisdiction.

3.0 Purpose

The Campus IRB is charged with reviewing human subject research proposals in accordance with the federal policies set forth in 45 CFR 46. The Department of Health and Human Services (DHHS) recognizes that not all human subject research proposals warrant review by a convened Full Board Committee. Accordingly, the DHHS regulations permit the Campus IRB to review lower-risk research proposals at levels other than by the full board. The 3 Levels of Review (Exempt, Expedited and Full board) recognizes the Campus IRB provides an opportunity to appropriately utilize available resources by the most efficient means.

4.0 Standard Operating Procedure

The Campus IRB recognizes its responsibility in assessing whether the anticipated benefit, either of new knowledge or of improved health for the research subjects, justifies inviting any person to undertake the risks of participation. The Campus IRB will disapprove human subject research in which the risks are judged unreasonable in relation to the anticipated benefits, and document its decision to disapprove accordingly. The Campus IRB shall only identify the risks and benefits that are presented by proposed research activities, not the possible long-range effects of applying the knowledge gained through research as among those research risks that fall within the purview of the Campus IRB responsibility. When the board does not have at least one person on the IRB with the appropriate scientific and scholarly expertise to conduct an in-depth review of the protocol, a consultant or guest may be invited to provide information to the board in compliance with the “Requesting Information from Consultants or Guests” policy.

Although many risks may be inherent in the methodologies of gathering and analyzing data, the investigator must take the necessary measures to safeguard the potential risk to the subject during participation in the project. Certain proposed subject populations may be more sensitive or vulnerable to the risks posed by the research as a result of their general condition or disabilities. The Campus IRB will assess the proposed activities to assure the proposal has safeguards to appropriately address the needs of vulnerable subject populations in compliance with the “Recruiting Vulnerable Subject Populations” policy.

The Campus IRB will conduct its processes in accordance with the “Campus IRB Review Processes”, “Privacy and Confidentiality”, “Noncompliance”, “Deviation”, and “Reporting” policies. The investigator must comply with these policies.

A. STEP #1: THE PROCESS FOR ASSESSING THE LEVEL OF RISK

The Campus IRB makes a determination of what level of review is afforded to a human subject research proposal by assessing the “Level of Risk” to the subject as a result of participation in the activities. Identification of the potential risk(s) requires the Campus IRB to assess whether the human subject research activities present greater than minimal risk to the subject. The Campus IRB shall review the proposed submissions in concert with the investigator’s responses assess the degree of risk in relation to the benefit derived from the subject participating in the research.

The Campus IRB defines “RISK” as the probability of harm or injury (physical, social, psychological, legal or economic) occurring *as a result of participation in a research study*. To categorize the review level, the Campus IRB shall accurately assess the level of risk(s) to the subject participants. When determining risk, the IRB assesses whether the risks to the human subject, posed by participation in research, can be justified by the anticipated benefits to the subject or society.

1. DEFINING THE LEVEL OF RISK FOR SUBJECTS

Research involving adult subject populations will be classified as either “minimal” or “greater than minimal” based on the interpretation of minimal risk as defined in 45 CFR 46.102(i).

- 1) Minimal Risk; and
- 2) Greater than Minimal Risk

Research involving child subject populations will be determined according to the requirements in 45 CFR 46.404-406. See Section VIII.C. for additional requirements on research involving children participants.

All review processes will be recorded in compliance with the “Record Keeping” and “Minutes” policies.

1a. THE LEVELS OF RISK

LEVEL 1 MINIMAL Risk

- The probability and magnitude of harm or discomfort “anticipated” in the research are no greater in and of themselves than those “ordinarily encountered in daily life...
- ...OR during the performance of “routine” physical or psychological examinations or tests.

Review Levels: **Exempt or Expedited**

LEVEL 2 GREATER THAN MINIMAL Risk

- This level of risk is defined as what is considered *extensive, significant*, or large.
- The IRB may consider a project to have *substantial or significant risk* if the risks to which subjects are exposed to as a result from participation in the research are either major or considerable under the given circumstances.

Review Levels: **Full Board**

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The Campus IRB respects that the risks posed by participation in research should be justified by the anticipated benefits to the subjects or to society. The Campus IRB is charged with judging whether the anticipated benefit (such as new knowledge or improved health for the research subjects) justifies recruiting subjects to undertake the risks of participating in the project.

The Campus IRB will deny approval for human subject research that is unreasonable in relation to the anticipated benefits.

1b. Additional Information

The Campus IRB recognizes that risks are often unavoidable, but can be reduced or managed through the incorporation of safeguards. To assure the investigator will reduce the probability of harm or limit its severity or duration to subject participants, the Campus IRB shall:

- 1) Review each proposal and assure that the risks are minimized to the extent possible;
- 2) Determine whether the investigator(s) is competent in the area studied and whether their services in dual roles might complicate their interactions with subjects; and
- 3) Assess whether the research design will yield useful data.

Example: If the sample size is too small to yield valid conclusions or a hypothesis is imprecisely formulated, subjects may be exposed to risk without sufficient justification. The Campus IRB recognizes that research design may not in and of itself, reduce or eradicate risks to subjects, but recognizes that faulty research design could mean that risks are not likely to be reasonable *in relation to the benefits*. Investigators should propose mechanisms that will minimize risks to subjects when applying for IRB approval.

2. PROCESS FOR ASSESSING THE RISK AND POTENTIAL BENEFITS TO SUBJECTS

The Campus IRB shall identify and analyze potential sources of risk and measures to minimize risk, including physical, psychological, social, legal, or economic risks. The PROCESS for the analysis of risk includes a determination that the risks to participants were reasonable in relation to the potential benefits to participants and to society.

The process for assessing the level of risk requires the Campus IRB to review the application or proposal submitted, submissions, supportive documents, investigator responses to IRB questions, and additional information to conduct an analysis of risks and potential benefits from participation, such as, but not limited to:

- a. The purposes of the research
- b. The scientific or scholarly merit of the proposal.
- c. The methodology and procedures proposed support sound research design
- d. A description of which procedures are standard treatment for diagnostic or treatment purposes
- e. The risks and benefits of the research
- f. The procedures are in place that are consistent with sound research design and will minimize risks by not unnecessarily exposing participants to risks.
- g. The procedures being used which are already being performed on the participant for diagnostic or treatment purposes, so as to minimize risks to subjects.
- h. Risks to participants reasonable in relationship to the potential benefits, if any, to participants, and the importance of the knowledge that might be expected to result.
- i. Consider if the risks of the research expose the participant to physical, psychological, legal, economic or professional risks
- j. The review process shall proceed in accordance with the CIRB Review Process Policy.

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3. THE REQUIREMENTS FOR IRB APPROVAL:

In order to approve research the IRB shall determine that all of the following requirements are satisfied:

- a. 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.
- b. Risks to subjects are reasonable in relation to anticipated benefits, if any, to subjects, and the importance of the knowledge that may reasonably be expected to result.
- c. 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 subjects would receive even if not participating in the research).
 - (i) 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.
- d. Selection of subjects is equitable.
 - (i) 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, mentally disabled persons, or economically or educationally disadvantaged persons.
- e. 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 45 CFR 46.116.
- f. Informed consent will be appropriately documented, in accordance with, and to the extent required by 45 CFR 46.117.
- g. When appropriate, the research plan makes adequate provisions for monitoring the data collected to ensure the safety of subjects.
- h. When appropriate, there are adequate provisions to protect the privacy of subjects and to maintain the confidentiality of data.
- i. When some or all of the subjects are likely to be vulnerable to coercion or undue influence, such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons, additional safeguards have been included in the study to protect the rights and welfare of these subjects.

4. ADDITIONAL INFORMATION THE IRB WILL REVIEW IN MAKING A DETERMINATION:

- a. 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 subjects would receive even if not participating in the research).
 - (i) 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.

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- b. Selection of subjects is equitable.
 - (ii) The activities must comply with the “Recruiting Vulnerable Subject Populations” policy.
 - (iii) 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, mentally disabled persons, or economically or educationally disadvantaged persons.
 - c. 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 45 CFR46.116.
 - d. Informed consent will be appropriately documented, in accordance with, and to the extent required by 45 CFR 46.117.
 - e. When appropriate, the research plan makes adequate provisions for monitoring the data collected to ensure the safety of subjects. See “Data Safety Monitoring Boards” section of this policy.
 - f. When appropriate, there are adequate provisions to protect the privacy of subjects and to maintain the confidentiality of data. The activities must comply with “Privacy and Confidentiality”. See policy.
 - g. When some or all of the subjects are likely to be vulnerable to coercion or undue influence, such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons, additional safeguards have been included in the study to protect the rights and welfare of these subjects. The activities must comply with “Recruiting Vulnerable Subject Populations”. See policy.
- A. The Campus IRB shall comply with the following 6 steps when assessing risk.
- 1. Identify the risks associated with the research, as distinguished from the risks of therapies the subjects would receive even if not participating in research;
 - 2. Determine that the risks will be minimized to the extent possible;
 - 3. Identify the probable benefits to be derived from the research;
 - 4. Determine that the risks are reasonable in relation to the benefits to subjects, if any, and the importance of the knowledge to be gained;
 - 5. Assure that potential subjects will be provided with an accurate and fair description of the risks or discomforts and the anticipated benefits; and
 - 6. Determine the intervals of continuing review, and where appropriate, determine that adequate provisions are in place for monitoring the data collected.
- B. Guidelines for each step are as follows:

1. Identify the risks associated with the research, as distinguished from the risks of therapies the subjects would receive even if not participating in research.

The Campus IRB shall carefully consider the categories of risk involved in the proposed research. The Campus IRB recognizes this is not an all-inclusive list, and will make every effort to properly assess the foreseeable research risks to the subjects.

a. Potential risk(s) associated with the informed consent process:

The Campus IRB recognizes that the informed consent document is only an “agreement” documented on a piece of paper that recognizes a subject’s

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understanding for a discreet moment in time. It is the researcher's responsibility, *on an ongoing basis*, to provide the participant(s) with the necessary information to help them understand the nature of the research so they can knowledgeably and voluntarily decide whether or not to participate. The Campus IRB will require a researcher to develop processes that address the fact that risk(s) may be presented to a subject when an informed consent process is ineffective.

b. Potential risk(s) associated with minor assent:

The Campus IRB recognizes that a minor does not have the legal capacity of providing informed consent, but does possess the ability to assent or dissent to participation in research. When a minor is recruited for research, the investigator(s) must obtain assent from the minor and permission from the parent(s) or authorized legal representative. The Campus IRB may consider alternative procedures for protecting the rights and interests of the minor, if the permission from the parent(s) is insufficient, inappropriate, or in opposition to the best interests of the minor.

The Campus IRB shall determine if assent from a minor is appropriate, on a case-by-case basis, following the assessment of the subject's capability to assent. The Campus IRB may waive this requirement at anytime.

The Campus IRB respects the minor's ability to dissent from participation in research, but may be overruled by the parent(s) or authorized legal representative at the discretion of the Campus IRB. If the minor is a mature adolescent and death is imminent, it is recommended that the minor's wishes be respected.

c. Potential risk(s) with children as research subjects:

The Campus IRB recognizes the special vulnerability of children. Research activities including children require special ethical and regulatory considerations. The Campus IRB shall consider the benefits, risks, and discomforts inherent in the proposed research and assess the investigator(s) justification in light of the expected benefits to the child or to society as a whole.

d. Potential physical risk(s):

Physical harm(s) or risk(s) include discomfort, pain, injury, illness, or disease brought about by the methods and procedures of research activities. The Campus IRB recognizes that some research activities are designed differently to measure the effects of therapeutic or diagnostic procedures applied in the course of caring for an illness. Such research may not entail any significant risks beyond those presented by medically indicated interventions. On the other end, research designed to evaluate the aspects of medical treatment may present more than minimal risk, and, on occasion cause serious or disabling injuries. The Campus IRB and investigator(s) shall take every precaution to adequately protect the human subjects involved in the proposed research.

e. Potential psychological risk(s):

The Campus IRB recognizes that participation in research may result in undesired changes in thought processes and emotions. The changes may be transitory, recurrent, or permanent. Stress or feelings of guilt or embarrassment may arise simply from thinking or talking about one's own behavior, attitudes or experiences. The Campus IRB recognizes that feelings may be aroused at any time. The Campus IRB recognizes that arousal may occur when the subject is being interviewed, filling out a questionnaire, or may be induced when the investigator(s) manipulates the

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subject's environment. The Campus IRB and investigator(s) shall take every precaution to adequately protect the human subjects involved in the proposed research.

f. Potential social and economical risk(s):

The Campus IRB recognizes that invasion of privacy and the breach of confidentiality may result in embarrassment within one's business or social group, loss or employment, civil or criminal prosecution. The Campus IRB shall assure the placement of strong safeguards in the processes to address the confidentiality of the subject. The investigator(s) shall take the necessary steps to avoid "stigmatizing" or "labeling" of subjects.

g. Potential risk(s) when investigator(s) involve deception:

The Campus IRB recognizes that some research methodologies are best implemented under processes that avoid full disclosure of the "research intent" during the Informed Consent process for the successful collection of valid data. The investigator should inform the Campus IRB of the research intent, and request modifications in the Informed Consent process accordingly. See Informed Consent Policy.

Participation in research may result in undesired changes in thought processes and emotions that may be transitory, recurrent, or permanent if the subject is deceived by false feedback about their own performance or lack of sufficient information prior to their participation. The Campus IRB shall review research activities involving deception or incomplete disclosure and determine whether the investigator(s) should provide a debriefing. The Campus IRB also recognizes that some subjects may not benefit from the results of their participation in the project and may be sensitive to those potential resulting harms.

The Campus IRB shall exercise good judgment and evaluate the potential risks on a case-by-case basis.

h. Potential risk(s) in regards to privacy and confidentiality:

See Privacy and Confidentiality policy.

i. Privacy: In the research context, invasion of privacy involves either covert observation or participant observation of behavior that the subject considers private. The Campus IRB must determine if 1) the invasion of privacy involved is acceptable in light of the subject's reasonable expectations of privacy in the situation under study; 2) the research question is of sufficient importance to justify the intrusion; and 3) the research design could be modified so that the study can be conducted without invading the privacy of subjects.

ii. Confidentiality: A breach of confidentiality is a separate issue from invasion of privacy. Maintaining the confidentiality of data involves safeguarding information that has been given voluntarily by one person to another. When research requires the use of a subject's records, the investigator(s) must assure adequate measures are in place to protect the confidentiality of that information. The Campus IRB must take the necessary precautions to assure the investigator(s) will address how that information will not only be obtained, but also how it will be protected.

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i. Potential risk(s) regarding the continuing review interval:

The Campus IRB will not grant approval on any project, longer than a 12 month period. Research projects raising concerns in the IRB process, may be placed on an approval interval *less* than every 12 months. See Continuing Review Process Policy.

The continuing review interval will may be shortened if the Campus IRB has concerns regarding

- 1) any aspect of the research activities;
- 2) any actual or perceived risk outweighing the benefit to the subject; or
- 3) deems it necessary to decrease the interval to further protect human subjects, the interval will be set for a shorter duration.

j. Potential risk(s) from research incentives:

The Campus IRB recognizes that potential subjects recruited for research may be offered monetary incentives, in exchange for their participation. Certain prospective subjects are vulnerable in that 1) the offers are too attractive and may blind prospective subjects to the risks or impair their ability to exercise proper judgment; and 2) the incentive may prompt subjects to lie or conceal information that, if known, would disqualify them from enrolling, or continue, as participants in a research project. See “Recruitment Process” and “Recruitment of Vulnerable Subject Populations” policies.

The Campus IRB shall assure the subject is informed that their participation is voluntary and that choosing not to participate will not affect their relationship with the researchers, University of Missouri-Columbia, or other individual or entity in any way. Whenever a research activity includes an incentive, the Campus IRB shall

- 1) review the proposed subject population(s);
- 2) review the incentive(s) being offered;
- 3) assess the presence of reasonable alternatives;
- 4) review the conditions under which the offer will be made; and
- 5) assess if the incentive is appropriate and equitable.

In cases where the subject must complete the activity prior to receiving one sole payment or the incentive is contingent upon full completion of the study, the Campus IRB shall review the study with higher scrutiny to determine whether coercion is an issue. The Campus IRB exercises high levels of scrutiny to projects proposing to require a subject to complete the research activities *before a payment will be made*. The Campus IRB views such measures as coercive, and removing the opportunity for the voluntary participation or withdrawal from research activities.

In cases where the subject must complete a portion of the study to receive a portion of the payment or incentive, the investigator(s) must specify in the informed consent process how the payments or incentives will be distributed.

2. Determine that the risks will be minimized to the extent possible.
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Following the assessment of the potential risk(s), the Campus IRB shall assess whether the research activities present greater than minimal risk to the subject. The Campus IRB shall calculate the degree of risk in relation to the benefit derived from participating in the research.

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The research categories outlined in the Federal regulations concerning children provide the Campus IRB with a reference tool to assess the degree of risk in proposed research activities.

The 4 categories of research used in the calculation of risk are:

- Category I: Research not involving greater than minimal risk (see 45 CFR 46.404);
- Category II: Research involving greater than minimal risk, but presenting the prospect of direct benefits to an individual subject (see 45 CFR 46.405);
- Category III: Research involving greater than minimal risk with no prospect of direct benefit to individual subjects, but likely to yield generalizable knowledge about the subject's disorder or condition (see 45 CFR 46.406);
- Category IV: Research not otherwise approvable which presents an opportunity to understand, prevent, or alleviate a serious problem affecting the health or welfare of individual subjects (see 45 CFR 46.407)

When proposed research involves more than minimal risk, is waiver of consent available?

A: When the proposed research presents no more than minimal risk, waiver or modification of consent requirements may be available at the discretion of the Campus IRB. In research presenting more than minimal risk, potential subjects must be informed of the availability of alternate treatment methods available and compensation in the case of research-related injury.

The Campus IRB recognizes that risks are often unavoidable, but they can be reduced or managed through the incorporation of safeguards. To reduce the probability of harm or limit its severity or duration, the Campus IRB shall 1) review each proposal and assure that the risks are minimized to the extent possible; 2) determine whether the investigator(s) is competent in the area studied and whether their service in dual roles might complicate their interactions with subjects; and 3) assess whether the research design will yield useful data. If the sample size is too small to yield valid conclusions or a hypothesis is imprecisely formulated, subjects may be exposed to risk without sufficient justification. The Campus IRB recognizes that research design may not itself reduce or eradicate risks to subjects, but recognizes that faulty research design means that risks are not likely to be reasonable in relation to the benefits.

3. Identify the probable benefits to be derived from the research.

There are 2 main categories of benefits: (1) Benefits to the subject population; and (2) Benefits to society. The Campus IRB will not approve any research that has no benefits.

The Campus IRB shall review the proposal to determine if the following benefits are present:

1. Ameliorating the subject's conditions or providing a better understanding of their disorders;
2. Increase understanding and knowledge about human physiology and behavior; and
3. Benefit to society as a whole. This includes: increased knowledge, improved safety, technological advances, and better health.

NOTE: Direct payments or other forms of remuneration or incentives offered to potential subjects shall not be considered a benefit to be gained from research. Although,

participation in research may provide a humanitarian contribution, its subjective benefits do not enter into the Campus IRB's analysis of benefits.

4. Determine that the risks are reasonable in relation to the benefits to subjects, if any, and the importance of the knowledge to be gained.

The Campus IRB will assess and evaluate the risk/benefit ratio on all proposed research activities in relation to community, professional, and ethical standards. The Campus IRB shall take into account the proposed subject population and be sensitive to the different perspectives that each subject population may have about the relevant risks and benefits. The Campus IRB shall be careful to avoid paternalism by being overprotective of subjects, in an effort to show appreciation for the importance of research.

5. Assure that potential subjects will be provided with an accurate description of the foreseeable risks or discomforts and the anticipated benefits.

The Campus IRB shall make every effort to assure that all subjects are provided with an accurate and full description of the proposed research activities and the ongoing risks and benefits associated with participation. The Campus IRB shall assure the safeguarding of human subject's welfare in research by requiring the research provides ongoing informed consent, as set forth by the Federal regulations and Campus IRB Policies.

6. Determine the intervals of continuing review, and where appropriate, determine that adequate provisions are in place for monitoring the data collected.

The Campus IRB will not grant a Continuing Review interval longer than 12 months. If the Campus IRB has outstanding concerns regarding 1) any aspect of the research activities, 2) any actual or perceived risk outweighing the benefit, or 3) deems it necessary to shorten the interval to further protect human subjects, the interval will be set for a shorter duration, in an effort to further safeguard the human subject participants.

The Campus IRB shall review and evaluate research activities at intervals appropriate to the degree of risk to subjects to determine:

1. If the risk/benefit ratio has changed;
2. Whether there are unanticipated findings involving risks to subjects;
3. Whether any new information regarding the risks and benefits should be provided to the subjects;
4. Whether the Campus IRB's findings warrant the researcher invoke special precautions or criteria; and
5. Whether the Campus IRB's findings warrant the research being modified or halted.

B. STEP #2 IDENTIFICATION OF THE CATEGORY OF REVIEW

The Campus IRB will carefully consider the level of risk to accurately assess and identify what category of review is appropriate for the proposed research (See Policy 2876.20 "Campus IRB Review Process"). A project should not be assigned a Level of Review in the absence of the assessment of risk. Once the assessment of risk has been completed, the Campus IRB will categorize the Level of Review accordingly. The Compliance Officer, Board Chair or their delegates may assign the level of review.

The category of review will be determine to support the range of actions or decisions that may be taken by the Campus IRB in all review practices, including the Initial Review, Continuing Review, Amendment or Modifications, or any other activity requiring IRB review.

C. DATA SAFETY MONITORING PLAN or DATA SAFETY MONITORING BOARDS

The Campus IRB will require the investigator to assure, when appropriate, the research plan makes adequate provision for monitoring the data collected to ensure the safety of subjects in accordance with 45 CFR §46.111(a)(6). If the research study doesn't involve greater than minimal risk, the Campus IRB will not require a Data Safety Monitoring Plan.

When is a data safety monitoring plan required?

If the research involves more than minimal risk, when appropriate, the Campus IRB will require the IRB submission (EXCEPT those qualifying as exempt) to include a Data Safety and Monitoring Plan (DSMP) or Data and Safety Monitoring Board Plan (DSMB). If the proposed study requires a DSMB, a copy of the plan will need to be attached to the IRB application.

The plan will need to detail how confidentiality is protected and, to the extent possible, risks are reduced to a minimum. The plan should be appropriate for the risks associated with it. The intensity and frequency of monitoring should be tailored to fit the expected risk level, complexity, phase and size of the particular study.

Criteria for requiring provisions for monitoring data to ensure the safety of participants.

1. Criteria for requiring a Data Safety Monitoring Board
 - a. Participation in the research poses greater than minimal risks including, but not limited to, physical, psychological, social, legal, or economic.
 - b. Participants are identified as being a member of a vulnerable population and because of participation in the trial or research pose potential risks including, but not limited to, physical, psychological, social, legal, or economic.
 - c. Monitoring should be commensurate with size and complexity of the proposed research
 - d. Participants in monitoring outcomes of a trial or research shall not be associated with the project. For trials that are conducted as part of a cooperative group, a majority of the individuals monitoring outcome data should be external to the group.

The Monitoring Plan should provide the following:

In research posing greater than minimal risk, and determined to meet the criteria requiring a data safety monitoring plan, the following provisions must be met for Campus IRB approval:

1. Description of Provisions to Ensure the Safety of Participants
 - a. The investigators must inform participants of information relevant to their continued participation, and pursue the research objectives with scientific diligence.
 - b. Monitoring should be commensurate with the proposed risks.
 - c. Monitoring must determine safe and effective conduct and recommend conclusion of the trial when significant benefits or risks have developed or the trial is unlikely to be concluded successfully.
 - d. Monitoring must be performed on a regular basis and conclusions and reported to an independent committee or authorized official.
 - e. The Campus IRB should be provided feedback on a regular basis, including findings from adverse-event reports, and recommendations derived from data and safety monitoring.
 - f. Monitoring activities should be conducted by experts in all scientific disciplines needed to interpret the data and ensure patient safety. (Examples: Clinical trial experts, biostatisticians, bioethics, and clinicians knowledgeable about the disease and treatment under study should be part of the monitoring group or be available if warranted.)
 - g. Monitoring members should not have a conflicting interest with the project.

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2. Determination of Adequate Protection for Participants in the Data Safety Monitoring Provisions
 - a. Ensure that monitoring is timely and effective
 - b. Evaluate the progress of interventional trial(s), including periodic assessments of data quality and timeliness, participant recruitment, accrual and retention, participant risk versus benefit, performance of trial sites, and other factors that can affect study outcome.
 - c. Monitoring should also consider factors external to the study when interpreting the data, such as scientific or therapeutic developments that may have an impact on the safety of the participants or the ethics of the study.

3. Documentation
 - a. Items to be monitored (i.e. subject eligibility, adherence to treatment plan, documentation of dropouts, evaluation of primary and secondary endpoints, adverse events and/or problems with informed consent)
 - b. Data Management: who is responsible for the collection and storage of data, where will it be stored (i.e. lab notebook, database) and security measures needed to protect the data from inadvertent loss or inappropriate use. Who will perform analysis on the data and how often?
 - c. A plan to assure compliance with reporting adverse events and/or unanticipated problems involving risk to participants or others.
 - d. The investigator should provide the IRB with feedback from the DSMB on a regular basis, to be determined by the IRB in cooperation with the investigator, including findings from adverse-event reports, and recommendations derived from data and safety monitoring.

DOCUMENTATION OF RISK

The Campus IRB must document the level of risk determination in the record in compliance with the “Record Keeping” and “Minutes” policy. See policy.

<p><i>Revised December 2006</i> <i>Revised June 2007</i> <i>Revised December 2007</i></p>
