USC University of Southern California

IRB Criteria for Approval

USC Research and Innovation
Human Research Protection Program

April 2024

Why talk about the approval criteria?

- Reminds us of our mission to protect the safety and welfare of research participants
- Refresher for some, newer information for others
- Keeps us focused and aligned with each other

Approval Criteria

Operationalize the ethical principles described in the Belmont Report

- Respect for Persons
  - The right to individual autonomy and protection for populations with compromised autonomy
  - Voluntariness, freedom from coercion or undue influence
  - Informed consent
  - Privacy and confidentiality
- Beneficence
  - Risks are reasonable in relation to the benefits of the research
  - Research is designed to minimize risks
  - Study design is sound
- Justice
  - Risks borne equally by members of society who are likely to benefit
  - Study does not select specific classes of individuals due to ease of their availability

Provide focus for IRB review

- Helps avoid committee diversion in directions that may not be related to the rights and welfare of research participants

45 CFR 46.111 & 21 CFR 56.111 Criteria for Approval

To approve research, the following requirements must be satisfied

1. Risks to participants are minimized (sound research design and acceptable procedures)
2. Risks to participants are reasonable in relation to anticipated benefits, if any, to participants and the importance of knowledge that may reasonably be expected to result
3. Selection of participants is equitable (considering purpose and setting of research)
4. Informed consent will be sought and documented (unless waived) accordingly
5. There are adequate provisions for data monitoring to ensure safety of participants if appropriate
6. There are adequate provisions to protect the privacy of participants and to maintain confidentiality of the data if appropriate
7. There are additional safeguards to protect the rights and welfare of participants likely to be vulnerable to coercion or undue influence

45 CFR 46. 111 Criteria for IRB approval of research (DHHS)
21 CFR 56.111 Criteria for IRB approval of research (FDA)

45 CFR 46.111 & 21 CFR 56.111 Criteria for Approval

1) Risk to Participants are Minimized

- Risks can be both time and situation specific
- Risks can be subjective and relevant to specific populations, or even individuals
- Possible type of harm
  - Social, physical, economic, legal, dignity and respect

2) Risk to Participants are Reasonable in Relation to Anticipated Benefits

- Consider only the risks and benefits that may result from the research
- Do not consider possible long-range effects of applying knowledge gained from the research (e.g., possible effects on public policy)

3) Selection of Participants is Equitable

- Inclusion/exclusion criteria are adequate
- Research purpose and setting are appropriate
- Recruitment process is fair
- Special requirements for vulnerable populations are addressed, if applicable

45 CFR 46.111 & 21 CFR 56.111 Criteria for Approval

4) Informed consent will be sought and documented (unless waived) accordingly

- Each participant, or their Legally Authorized Representative (LAR) will sign an informed consent
- Will be appropriately documented
- OR will be waived

5) There are adequate provisions for data monitoring to ensure safety of participants if appropriate

- For greater than minimal risk research, there is an adequate plan describing how the study will be monitored to ensure safety (e.g., sponsor, data monitoring committee, data safety monitoring board, independent medical monitor)

45 CFR 46.111 & 21 CFR 56.111 Criteria for Approval

6) There are adequate provisions to protect the privacy of participants and to maintain confidentiality of the data if appropriate

- **Privacy**
  - Evaluate the methods used to identify and contact potential participants
  - Consider the settings in which participants will interact with the study team and the appropriateness of all personnel present for research activities
  - Look at the nature of information obtained about participants (is it the minimum amount necessary to achieve research goals)
  - Is information obtained about individuals other than the participant (family members, etc).
- **Confidentiality**
  - What protections are in place to minimize the likelihood that information about participants will not be inappropriately divulged
  - Do the safeguards to protect confidentiality align with the potential of harm from unauthorized, inappropriate or unintentional disclosure

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45 CFR 46.111 & 21 CFR 56.111 Criteria for Approval

7) There are additional safeguards to protect the rights and welfare of participants who may be vulnerable to coercion or undue influence

- Consider the scientific and ethical reasons for including vulnerable participants in research
- Determine if additional safeguards are required (including but not limited to regulations regarding risks to children, considerations for individuals without decision-making capacity,)

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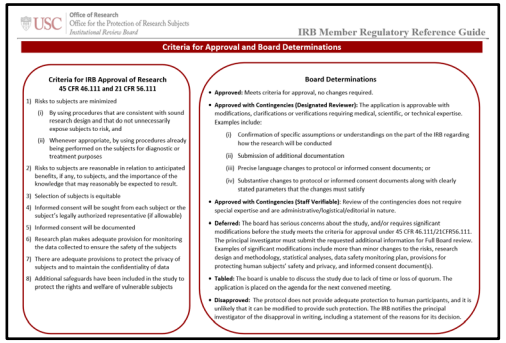
Where Can I Find These Criteria in More Detail?

- USC HRPP Website
  - Policies
  - IRB Member Toolbox
- IRB Member Regulatory Reference Guide (attached with meeting agenda)
- Code of Federal Regulations
  - 45 CFR 46.111
  - 21 CFR 56.111
- IRB Member Handbook (Amdur/Bankert)
- iStar (Continuing Review/Expedited Review)

IRB Member Toolbox

Password protected page for IRB Members only.


USC Office of Research Office for the Protection of Research Subjects Institutional Review Board

IRB Member Regulatory Reference Guide

Criteria for Approval and Board Determinations

Criteria for IRB Approval of Research 45 CFR 46.111 and 21 CFR 56.111

1) Risks to subjects are minimized
   (i) By using procedures that are consistent with sound research design and that 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
2) 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.
3) Selection of subjects is equitable
4) Informed consent will be sought from each subject or the subject's legally authorized representative (if allowable)
5) Informed consent will be documented
6) Research plan makes adequate provision for monitoring the data collected to ensure the safety of the subjects
7) There are adequate provisions to protect the privacy of subjects and to maintain the confidentiality of data
8) Additional safeguards have been included in the study to protect the rights and welfare of vulnerable subjects

Board Determinations

- **Approved:** Meets criteria for approval, no changes required.
- **Approved with Contingencies (Designated Reviewer):** The application is approvable with modifications, clarifications or verifications requiring medical, scientific, or technical expertise. Examples include:
  - (i) Confirmation of specific assumptions or understandings on the part of the IRB regarding how the research will be conducted
  - (ii) Submission of additional documentation
  - (iii) Precise language changes to protocol or informed consent documents; or
  - (iv) Substantive changes to protocol or informed consent documents along with clearly stated parameters that the changes must satisfy
- **Approved with Contingencies (Staff Verifiable):** Review of the contingencies does not require special expertise and are administrative/logistical/editorial in nature.
- **Deferred:** The board has serious concerns about the study, and/or requires significant modifications before the study meets the criteria for approval under 45 CFR 46.111/21CFR56.111. The principal investigator must submit the requested additional information for Full Board review. Examples of significant modifications include more than minor changes to the risks, research design and methodology, statistical analyses, data safety monitoring plan, provisions for protecting human subjects' safety and privacy, and informed consent document(s).
- **Tabled:** The board is unable to discuss the study due to lack of time or loss of quorum. The application is placed on the agenda for the next convened meeting.
- **Disapproved:** The protocol does not provide adequate protection to human participants, and it is unlikely that it can be modified to provide such protection. The IRB notifies the principal investigator of the disapproval in writing, including a statement of the reasons for its decision.

Chapter 7: Process of IRB Submissions

Revised on 3/28/2024

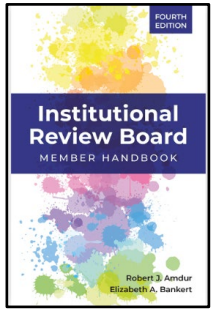
This chapter focuses on the IRB submission and review processes. It includes an overview of iStar, the electronic application system used to submit all human subjects proposals to the IRB, the criteria for IRB approval, the review process for the different submission types, and IRB determinations and correspondence details.

- **7.1 IRB Online Applications (iStar)**
- **7.2 ClinicalTrials.Gov**
- **7.3 Criteria for IRB Approval of Research**

NATIONAL ARCHIVES

Code of Federal Regulations

A point in time eCFR system



iStar

Please Verify that the following "Criteria for IRB approval of Research" (45 CFR 46.111) are met or will be met following specified changes:

- ☐ **(1) Risks to subjects are minimized.**
- ☐ **(2) Risks to subjects are reasonable in relation to the expected benefits.**
- ☐ **(3) Selection of subjects is equitable.**
- ☐ **(4) Informed Consent will be sought in accordance with federal regulations (45 CFR 46.116).**
- ☐ **(5) Informed Consent will be documented in accordance with federal regulations (45 CFR 46.117).**
- ☐ **(6) When appropriate, adequate provision for monitoring data provided.**
- ☐ **(7) When appropriate, protection of the privacy and confidentiality of data provided.**
- ☐ **When subjects are likely to be vulnerable, additional safeguards included.**

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Thank You!

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