New Name for the Office of Research Compliance

The Office of Research Compliance will now be known as **Research Compliance Services** to reflect its longstanding commitment to provide researchers with guidance and tools to understand and comply with federal laws and institutional policy regarding the conduct of research.

**Institutional Review Board IRB**

Importance of Continuing Review

According to federal regulations and institutional policy, the IRB must prepare and maintain written procedures for conducting continuing review (45 CFR 46.103(b)(4)) of studies approved under the expedited or full board review criteria. At UConn, continuing review may be more commonly known as “re-approval submissions.” Continuing review of research must occur at intervals appropriate to the degree of risk, but not less frequently than once per year (45 CFR 46.109(e)). All expedited and full-board approval letters clearly and boldly indicate the approval period – the date of approval and the expiration date. The letters also clearly indicate when re-approval material must be submitted for review. Re-approval material for studies that are approved under the expedited criteria must be submitted **four weeks** before the expiration date. Re-approval material for studies reviewed by the full board must be submitted **six weeks** before the expiration date.

Lapses of IRB approval are considered to be **non-compliance with research regulations** and institutional policy. Lapses are a serious matter. When the approval period expires all research activities involving human subjects must stop. Such activities include: recruitment, enrollment, conduct of experimental procedures and data analysis. All communication and interaction with participants must stop until IRB re-approval has been secured.

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Federal regulations “make no provision for any grace period extending the conduct of research beyond the expiration date of IRB approval.” Guidance from the Office for Human Research Protections (OHRP), the federal office charged with protecting the rights, welfare, and well-being of subjects involved in research, notes that “when IRB approval of an ongoing research project lapses and the investigator wants to continue the project, the IRB should complete continuing review for the project as soon as possible.” At UConn, the IRB has determined that a 30 day grace period from the date the protocol expires is an adequate amount of time to allow lapsed protocols to be considered for re-approval. The IRB would like to stress that no research activities involving human subjects may be carried out during the grace period.

Federal regulations require the IRB recognize and to report patterns of non-compliance for those who repeatedly fail to submit re-approval material in a timely manner to meet continuing review dates. See http://www.hhs.gov/ohrp/policy/continuingreview2010.html#section-
h.

It is important to note that the federal regulations also require the IRB to report itself if it repeatedly fails to meet continuing review dates. It is critical that the IRB and researchers collaborate to ensure that these regulations and policies are being scrupulously followed. Toward that end the IRB will take the following steps:

**Only one 30 day grace period will be granted to each PI.** Reapproval material submitted after 30 days will not be accepted and the protocol will be terminated. Investigators who wish to continue the study must submit a new protocol application.

The IRB will maintain a list of investigators who fail to submit re-approval material in a timely manner. Patterns of non-compliance will be reported to OHRP and funding agencies.
Calculation of Sample Size and Over-enrollment of Human Subjects

Determining the appropriate sample size needed to achieve the goals of a research study is a critical component of study design. The IRB-1 protocol application form has a section entitled “Justification of Sample Size/Data Analysis”, where investigators conducting quantitative research studies must provide a power analysis that includes effect size, power, and level of significance with references for how the sample size was determined. Why is this relevant to human subjects protection?

Federal regulations require the IRB to review research and approve it only if “risks to subjects are minimized by using procedures which are consistent with sound research design and which do not unnecessarily expose subjects to risk” (45 CFR 46.111). “Regardless of whether sample size is determined based on feasibility or a power calculation, if investigators recruit less or more subjects than are necessary to answer the research question, then they have unnecessarily exposed subjects to risk.” This concept also applies to minimal risk and qualitative research studies. It is a matter of respecting the time participants volunteer to give in order to be in a study and inconveniencing them unnecessarily.

Accruing an adequate sample is also reflective of the concepts of Beneficence and Justice as described in the Belmont Report (1979). By accruing only the number of subjects needed to answer the research question and avoiding placing extra subjects at risk, researchers are promoting the welfare of the subjects while minimizing harm (Beneficence). Conversely, by avoiding an insufficient sample size, researchers allow more research subjects to share in both the burdens and benefits of the research, rather than limiting these to a small number of people (Justice).

It is important to note that the calculation of sample size must include ALL participants who sign the consent form (or who verbally/electronically agree to be in your study). Participants who withdraw, drop out or are removed from the study by the PI must be counted as ENROLLED.

Please be aware that over enrollment constitutes non-compliance and for federally funded research, may be a reportable event.

Much of the text in this article is attributable to:
Governor Jerry Brown Vetoes Compensation for Donation of Cells:

“Not everything in life is for sale nor should it be,” Jerry Brown, Governor of California, stated in reference to his decision to veto a bill that would compensate egg donors for oocytes and egg cells to be used for research purposes. Brown’s decision to veto this law means that California researchers cannot recruit donors by offering compensation beyond actual costs. New York is currently the only state that authorizes compensation to donors. The bill had been prompted in part to make it possible for California stem cell researchers to use the lines created at the Oregon Health Sciences University through cloning. The donors of the oocytes used had been paid. Assemblywoman Susan Bonilla had argued that women should be compensated for their eggs just as men are for their sperm donations. Bonilla further expressed that she believed that by compensating women it would help to make oocytes available for research involving fertility issues. At this time, it is unknown whether it will be possible to override the veto with a 2/3 vote from each house of the Legislature.
AAALACi Update

As many of you know, the University went through the AAALACi reaccreditation process last March. We are happy to report that UConn’s animal care and use program was awarded “exemplary” status. This places our program in the top 10% of AAALACi accredited facilities. We appreciate the hard work and effort put into maintaining an exemplary program and hope that you all share in the sense of pride and accomplishment we feel about our program.

Semi-Annual Inspection Cycles

In an effort to standardize our inspection and program review process we have formalized the creation of two inspection cycles per year. These inspections will always fall in the months of October and April. Typically the facility inspections occur in the first two weeks of the cycle, allowing time for make-ups during the second half of the month. We hope this predictability will make the process go more smoothly for Principal Investigators and allow more time for preparation.

Enrichment

Animal well-being helps to ensure animal welfare, and enrichment is one way to promote well-being. Here at UConn, all our animals are offered some form of enrichment as a part of standard animal husbandry. Enrichment can include social housing, positive human-animal interactions, provision of nesting, perching and gnawing materials, shelters or toys; some animals are even provided treats such as fruits or vegetables. PI’s can opt-out of some or all aspects of the enrichment program if there is a concern that the enrichment would interfere with research goals. Please review the OAC Enrichment SOP at the following link: http://oac.uconn.edu/downloads/sop_1400-updated.pdf and feel free to contact our office if there are questions.

UConn’s Institutional Animal Care and Use Committee (IACUC)-A Profile

Our IACUC is a group of dedicated men and women committed to supporting research and ensuring animal welfare. Representing eight University departments, veterinarians, health and safety personnel and community members, our membership brings a diversity of backgrounds and expertise to the table when reviewing and approving activities in live animals. Currently our IACUC has 13 members and 2 alternates, consisting of 8 Faculty, 3 veterinarians, 2 community members, and 3 members of the staff.

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IACUC Meeting Dates

Wednesday, November 20, 2013
Wednesday, December 11, 2013
Updated Risk Assessment from the NIH

In March the updated “NIH GUIDELINES FOR RESEARCH INVOLVING RECOMBINANT OR SYNTHETIC NUCLEIC ACID MOLECULES” brought the addition of synthetic nucleic acids to the IBC review process. This was a Major Action by the NIH. These changes are outlined in the December 2012 Guidelines. There were also several Minor Actions taken in this revision, including a change to the classification of a widely used viral vector.

Adenovirus-Associated Viruses (AAV) are common among the human population but have not been directly linked to an infectious disease. Prior to March 2013, the NIH only recognized serotypes 1-4 as Risk Group 1 agents. Risk Group 1 being those agents which are not known to cause infection and disease in healthy humans. This left the classification of the other serotypes requiring a risk assessment. Prudent practice suggested that they be assigned to Risk Group 2 as a means of communicating the potential risk of infection and any unknown diseases they may cause. Biosafety Level 2 containment practices are generally required for Risk Group 2 agents.

The NIH Guidelines now state that all AAV serotypes are considered to be Risk Group 1. This change allows the PI and the IBC to focus the risk assessment on the type of experiments being done and not weight it on the perceived risk of the agent. The lower Risk Group assignment may allow for a lower biosafety containment level.

The focus of the other minor actions was the use of Highly Pathogenic Avian Influenza and incident reporting requirements in BSL3 laboratories.

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