

Lessons Learned: Regulatory Processes & Compliance

Research Directors and Chairs



Overview

- General requirements
- Institutional Review Board (IRB)
- Clinical Trials Office (CTO)
- Office of Sponsored Research (OSR)
- Institutional Requirements
- Grants Management



General Requirements

- Complete required training
 - All personnel involved in project
 - Human Subjects Training IRB
 - Animal Research Training
- Learn your other institutional requirements
- Ensure faculty, residents, students are familiar with regulatory process and compliance
- Communicate, communicate, communicate
- Monitor faculty compliance



- Get to know your IRB
- Find a liaison & build relationship
- Questions to ask
 - Common pitfalls
 - What are common questions asked of the IRB?
 - o Is there a pre-review process?
 - o How often does the committee meet?
 - Turnaround time?
 - Are there pet peeves that we should avoid?
 - Can you share examples of successful IRB submissions?



- Get training on the IRB submission system
- What are rules around consent?
 - Is there an institutional required consent form / format?
 - Is there universal consent or does each participant need to be consented for each project?
- When is a Data Safety Monitoring Board required?



- When are protocols considered exempt?
 - What forms have to be submitted for exempt protocols?
 - Publishers often request proof of IRB approval, even for exempt protocols
- Is QI exempt?



- Consider ways to work with IRB to develop alternatives for QI
- Understand when IRB is needed
- Acquire system
 - Used for QI
 - 3-page description to allow IRB to determine not research
- Are there other systems within the IRB to streamline identification projects as QI?
 - Explore whether opt-out system could be used



Best Practices:

- Have research director or assigned staff pre-review IRB submissions before they are submitted
- Train a research staff or coordinator to be primary resource for IRB application development and submission (especially for learners)



Clinical Trials Office

- Get to know the Office of Clinical Trials
 - Find a liaison
 - Questions to ask:
 - What support is offered?
 - Who are the experienced clinical coordinators on campus?
 - Is there a pool from which coordinators can be assigned?
 - Do you have to hire your own coordinators?
 - What training is available for them?
 - Is there budget development support?
 - Who is the contracts liaison?





Office of Sponsored Research

- Get to know the Office of Sponsored Research
- Find a liaison
- Questions to ask □
 - How is the office organized?
 - Where are the institutional policies for responsibilities?
 - Are there separate pre- and post- award staff?
 - How are staff assigned?
 - Is it separate by pre and post award?
 - By funding mechanism?
 - What level of support is offered?
 - What is the department responsible for?
 - Is foundation funding going through OSR or does it go through development?
 - What is the communication between the two?





Institutional Requirements

- Who invites patients to be participants
- Data security
- Determine who "owns" access to data from your clinics
- Supervision of trainees and research coordinators
- How to advocate when problems arise?



Grants Management

- Every grant has administrative burden (large & small)
- Understand funder requirements and post award reporting obligations
 - o Different funders have different requirements
- Think about how to support mission yet balance burden
- Be sure PIs are qualified & understand
 - o PI responsibilities & obligations
 - Supervision of staff
 - Requirements for budget management & reporting
 - Make sure they have data needed





Grants Management

- Understand funding management
- Understanding funding limitations
 - Know what NIH will and won't fund
 - Cap gap (PCORI is lower than NIH)
 - University requirements for funding (e.g., minimum requirements)
 - Understanding how different financial streams can cover gaps



Summary

- Learn the universal and institution-specific regulatory and compliance policies
- Faculty and learners need to obtain required training
- Develop relationships with the IRB, CTO, and OSR offices
 - They will make the process smoother
- Learn institutional and funder requirements surrounding grants management

