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## What is the purpose of this manual?

This document is designed to guide you through policies and procedures related to the conduct of human research that are specific to this organization.

General information regarding human research protections and relevant federal regulations and guidance is incorporated into the required human protections training. For additional information see below: “What training does my staff and I need in order to conduct human research?”

## What is Human Research?

“[HRP-010 POLICY - Human Research Protection Program](https://research.temple.edu/sites/research/files/images/HRP-010%20POLICY%20-%20Human%20Research%20Protection%20Program.docx)” defines the activities that this organization considers to be “Human Research.” An algorithm for determining whether an activity is human research can be found in the “[HRP-421 WORKSHEET - Human Research](https://research.temple.edu/sites/research/files/images/HRP-421%20WORKSHEET%20-%20Human%20Research.pdf).” Use this document for guidance, keeping in mind that the IRB makes the ultimate determination in questionable cases as to whether an activity constitutes human research subject to IRB oversight.

You are responsible not to conduct human research without prior IRB review and approval. If you have questions about whether an activity is human research, contact the IRB Office who will provide you with a determination. If you wish to have a written determination, provide a written request to the IRB Office.

If you have questions about whether an activity requires IRB review, contact the IRB Office.

## What is the Human Research Protection Program?

A Human Research Protection Program or HRPP is an organization-wide system to protect human subjects in research. It is described in “[HRP-010 POLICY: Human Research Protection Program](https://research.temple.edu/sites/research/files/images/HRP-010%20POLICY%20-%20Human%20Research%20Protection%20Program.docx).”

## What training does my staff and I need to conduct human research?

All members of the research team involved in the design, conduct, or reporting of the research must complete training.

Investigators and staff conducting research must complete:

* The Collaborative Institutional Training Initiative (CITI) human subjects online training program. The CITI site can be accessed at <http://www.citiprogram.org/>. Either the basic or refresher medical course; or the basic or refresher social and behavioral course. Non-Temple employees who cannot access CITI must submit proof of comparable training. This training is valid for a two-year period.
* Practice Runs training. This training is valid for a one-year period.

On a case-by-case basis, the IRB can approve alternative training.

This section describes the training requirements imposed by the IRB. You may have additional training imposed by other federal, state, or organizational policies.

Members of the research team who have not completed human research protections training may not take part in aspects of the research that involve human subjects.

## What are the obligations of individuals who conduct human research?

The obligations of individuals who conduct human research can be found in these documents (which can be downloaded by clicking the links or found at <https://research.temple.edu/irb-forms-standard-operating-procedures>):

* [HRP-070 POLICY - Investigator Obligations](https://research.temple.edu/sites/research/files/images/HRP-070%20POLICY%20-%20Investigator%20Obligations.docx)
* [HRP-071 POLICY - Prompt Reporting Requirements](https://research.temple.edu/sites/research/files/images/HRP-071%20POLICY%20-%20Prompt%20Reporting%20Requirements.docx)
* [HRP-802 INVESTIGATOR GUIDANCE - Informed Consent](https://research.temple.edu/sites/research/files/images/HRP-802%20INVESTIGATOR%20GUIDANCE%20-%20Informed%20Consent.docx)
* [HRP-803 INVESTIGATOR GUIDANCE - Documentation of Informed Consent](https://research.temple.edu/sites/research/files/images/HRP-803%20INVESTIGATOR%20GUIDANCE%20-%20Documentation%20of%20Informed%20Consent.docx)
* [HRP-810 INVESTIGATOR GUIDANCE - Additional DOD Obligations](https://research.temple.edu/sites/research/files/images/HRP-810%20INVESTIGATOR%20GUIDANCE%20-%20Additional%20DOD%20Obligations.docx)
* [HRP-811 INVESTIGATOR GUIDANCE - Additional DOE Obligations](https://research.temple.edu/sites/research/files/images/HRP-811%20INVESTIGATOR%20GUIDANCE-%20Additional%20DOE%20Obligations.docx)
* [HRP-812 INVESTIGATOR GUIDANCE - Additional DOJ Obligations](https://research.temple.edu/sites/research/files/images/HRP-812-INVESTIGATOR%20GUIDANCE-%20Additional%20DOJ%20Obligations.docx)
* [HRP-813 INVESTIGATOR GUIDANCE - Additional ED Obligations](https://research.temple.edu/sites/research/files/images/HRP-813%20INVESTIGATOR%20GUIDANCE%20-%20Additional%20ED%20Obligations.docx)
* [HRP-814 INVESTIGATOR GUIDANCE - Additional EPA Obligations](https://research.temple.edu/sites/research/files/images/HRP-814%20INVESTIGATOR%20GUIDANCE%20-%20Additional%20EPA%20Obligations.docx)
* [HRP-815 INVESTIGATOR GUIDANCE - Additional FDA Obligations](https://research.temple.edu/sites/research/files/images/HRP-815%20INVESTIGATOR%20GUIDANCE%20-%20Additional%20FDA%20Obligations.docx)
* [HRP-816 INVESTIGATOR GUIDANCE - Additional ICH-GCP Obligations](https://research.temple.edu/sites/research/files/images/HRP-816%20INVESTIGATOR%20GUIDANCE%20-%20Additional%20ICH-GCP%20Obligations.docx)

## How do I submit new human research to the IRB?

Submit the Application via the ERA module.

Please refer to our website for access to ERA and training guides: <https://era.temple.edu/tu_login/login.asp>.

Please refer to the following link for FAQs about the ERA submission process: <http://research.temple.edu/era/faq>.

Please refer to our website for access to the ERA Human Subjects Development Guide:

<https://atlas.ocis.temple.edu/research/researchadmin/era/era_user_guide.asp>.

Please refer to the following link for FAQs about human subjects research: <http://research.temple.edu/research-compliance/faqs-research-compliance>.

## How do I write an Investigator Protocol?

You may use “[HRP-504 TEMPLATE - Protocol](https://research.temple.edu/sites/research/files/images/HRP-504%20-%20TEMPLATE%20Protocol.tu_.docx)” or “[HRP-504 TEMPLATE - Protocol Minimal Risk](https://research.temple.edu/sites/research/files/images/HRP-504%20TEMPLATE%20-%20Minimal%20Risk%20Protocol.tu_.docx)” as a starting point for drafting a new Investigator Protocol, and reference the instructions in italic text for the information the IRB looks for when reviewing research. You may use any format or style as long as the required information is included.

## How do I create a consent document?

You may use “[HRP-500 TEMPLATE - Consent](https://research.temple.edu/sites/research/files/images/hrp-500%20template%20-%20main%20informed%20consent.tu_.docx)” or “[HRP-500 TEMPLATE - Consent for Minimal Risk Research](https://research.temple.edu/sites/research/files/images/hrp-500%20template%20-%20minimal%20risk%20consent.tu_%20%2815%29.docx)” to create a consent document. You may use any format or style as long as the required information is included.

Most consent documents, summaries, and consent scripts must include the required and additional appropriate disclosures in Section 4 of “[HRP-400 WORKSHEET - Criteria for Approval](https://research.temple.edu/sites/research/files/images/HRP-400%20WORKSHEET%20-%20Criteria%20for%20Approval.pdf).”

Date the revisions of your consent documents to ensure that you use the most recent version approved by the IRB.

## What are the different regulatory classifications that research activities may fall under?

Submitted activities may fall under one of the following four regulatory classifications:

* Not “Human Research”: Activities that do not meet the organizational definition of “Human Research” do not fall under IRB oversight. The criteria for whether an activity is human research is in “[HRP-421 WORKSHEET - Human Research](https://research.temple.edu/sites/research/files/images/HRP-421%20WORKSHEET%20-%20Human%20Research.pdf)” Contact the IRB Office in cases if you are uncertain whether an activity is human research.
* “Human research that does not engage the institution”: Some human research requires review by an IRB, but is not the responsibility of the organization. The criteria for this determination is in “[HRP-422 WORKSHEET - Engagement](https://research.temple.edu/sites/research/files/images/HRP-422%20WORKSHEET%20-%20Engagement.pdf)” Contact the IRB Office in cases if you are uncertain whether human research is the responsibility of the organization.
* Exempt: Certain categories of human research may be exempt from regulation but require IRB review. It is the responsibility of the organization, not the investigator, to determine whether human research is exempt from IRB review. “[HRP-423 WORKSHEET - Exemptions](https://research.temple.edu/sites/research/files/images/HRP-423%20WORKSHEET%20-%20Exemptions.pdf)” for the categories of research that may be exempt.
* Review Using the Expedited Procedure: Certain categories of human research are not exempt but may qualify for review using the expedited procedure, meaning that the project may be approved by a single designated IRB reviewer, rather than the convened board. Review the IRB Administration’s “[HRP-424 WORKSHEET - Expedited Review](https://research.temple.edu/sites/research/files/images/HRP-424%20WORKSHEET%20-%20Expedited%20Review.pdf)” for the categories of research that may be reviewed using the expedited procedure.
* Review by the Convened IRB: Non-exempt human research that does not qualify for review using the expedited procedure must be reviewed by the convened IRB.

## What are the decisions the IRB can make when reviewing proposed research?

The IRB may approve research, require modifications to the research to secure approval, table research, or disapprove research:

* Approve: Made when all criteria for approval are met. See “How does the IRB decide whether to approve human research?” below.
* Conditionally Approve (Modifications Required to Secure Approval): Made when IRB members require specific modifications to the research before approval can be finalized. The IRB describes the required modifications and their reasons, and gives the investigator an opportunity to respond to the IRB in person or in writing.
* Defer: Made when the IRB determines that the board is unable to approve research and the IRB suggests modifications the might make the research approvable. The IRB describes the recommended modifications and their reasons, and gives the investigator an opportunity to respond to the IRB in person or in writing.
* Disapprove: Made when the IRB determines that it is unable to approve research and the IRB cannot describe modifications the might make the research approvable. The IRB describes its reasons for this decision and gives the investigator an opportunity to respond to the IRB in person or in writing.

## How does the IRB decide whether to approve human research?

The criteria for IRB approval for exempt research can be found in the “[HRP-423 WORKSHEET - Exemptions](https://research.temple.edu/sites/research/files/images/HRP-423%20WORKSHEET%20-%20Exemptions.pdf)” for exempt human research and for non-exempt research in “[HRP-400 WORKSHEET - Criteria for Approval](https://research.temple.edu/sites/research/files/images/HRP-400%20WORKSHEET%20-%20Criteria%20for%20Approval.pdf).” The latter worksheet references other checklists that might be relevant. All checklists and worksheets can be found on the IRB Web site.

These checklists are used for initial review, continuing review, and review of modifications to previously approved human research.

You are encouraged to use the checklists to write your protocol in a way that addresses the criteria for approval.

## What will happen after IRB review?

The IRB will provide you with a written decision indicating that the IRB has approved the human research, requires modifications to secure approval, or has disapproved the human research.

* If the IRB has approved the human research: The human research may commence once all other organizational approvals have been met. IRB approval is usually good for a limited period of time which is noted in the approval letter.
* If the IRB conditionally approved your research (modifications required to secure approval) and you accept the modifications: Make the requested modifications and submit them to the IRB. If all requested modifications are made, the IRB will issue a final approval. Research cannot commence until this final approval is received. If you do not accept the modifications, write up your response and submit it to the IRB.
* If the IRB deferred the human research: The IRB will provide a statement of the reasons for deferral and suggestions to make the study approvable, and give you an opportunity to respond in writing. In most cases if the IRB’s reasons for the deferral are addressed in a modification, the human research can be approved
* If the IRB disapproved the human research: The IRB will provide a statement of the reasons for disapproval and give you an opportunity to respond in writing.

In all cases, you have the right to address your concerns to the IRB directly at an IRB meeting.

## How do I submit continuing review?

Submit the Continuing Review form via the ERA module.

If the approval of Human Research expires, all Human Research procedures related to the protocol under review must cease, including recruitment, advertisement, screening, enrollment, consent, interventions, interactions, and collection of private identifiable information. Continuing Human Research procedures is a violation of federal regulations. If current subjects will be harmed by stopping Human Research procedures that are available outside the Human Research context, provide these procedures on a clinical basis to protect current subjects. If current subjects will be harmed by stopping Human Research procedures that are not available outside the Human Research context, immediately contact the IRB Chair and provide a list of the currently enrolled subjects and why they will be harmed by stopping Human Research procedures.

## How do I submit a modification?

Submit the Modification Request form via the ERA module.

Please note that implementation of the modification cannot occur until you receive IRB approval.

## How do I close out a study?

Submit the Final Report via the ERA module.

Note that studies that are deemed exempt must also be closed.

## How long do I keep records?

“[HRP-070 POLICY - Investigator Obligations](https://research.temple.edu/sites/research/files/images/HRP-070%20POLICY%20-%20Investigator%20Obligations.docx)” defines your records retention requirements.

## What if I need to use an unapproved drug, biologic, or device and there is no time for IRB review?

Contact the IRB office or IRB chair immediately to discuss the situation. If there is no time to make this contact, review the worksheet below that is most relevant, follow the requirements, and contact the IRB office or IRB chair by the close of the next business day:

* [HRP-451 WORKSHEET - Emergency Use Drugs and Biologics](https://research.temple.edu/sites/research/files/images/HRP-451%20WORKSHEET%20-%20Emergency%20Use%20Drugs%20and%20Biologics.pdf)
* [HRP-452 WORKSHEET - Emergency Use Devices](https://research.temple.edu/sites/research/files/images/HRP-452%20WORKSHEET%20-%20Emergency%20Use%20Devices.pdf)
* [HRP-453 WORKSHEET - Compassionate Use Devices](https://research.temple.edu/sites/research/files/images/HRP-453%20WORKSHEET%20-%20Compassionate%20Use%20Devices.pdf)

If you are using an unapproved drug or biologic, use the “[HRP-502 TEMPLATE - Consent for Emergency Use](https://research.temple.edu/sites/research/files/images/HRP-502%20-%20TEMPLATE%20Consent%20for%20Emergency%20Use.tu_.docx)” to prepare your consent document.

FDA considers emergency use of an unapproved drug or biologic to be research and the individual getting the test article to be a subject. FDA does not consider emergency use of an unapproved device to be research. However, FDA guidance recommends following similar rules.

Individuals getting an unapproved drug, biologic, or device without prior IRB review cannot be considered a “subject” as defined by DHHS and their results cannot be included in prospective “research” as that term is defined by DHHS.

## How do I get additional information and answers to questions?

Check the IRB website: <https://research.temple.edu/irb>

The website contains our forms, templates, worksheets, checklists, FAQs, ERA FAQs, ERA tutorials, and training materials.

The IRB office contact information is below:

3340 North Broad Street, Suite 427

Philadelphia, PA 19140

irb@temple.edu

(215) 707-3390

Contact information for IRB staff and IRB Chairpersons can be found at: <https://research.temple.edu/ovpr-updates/staff-directory#IRB>

If you have questions, concerns, complaints, allegations of undue influence, allegations or findings of non-compliance, or input regarding the Human Research Protection Program that cannot be addressed by contacting the IRB, follow the directions in the “[HRP-010 POLICY - Human Research Protection Program](https://research.temple.edu/sites/research/files/images/HRP-010%20POLICY%20-%20Human%20Research%20Protection%20Program.docx).”