3. The EPO OADS reviews the request and determines if more information is needed. If the project is determined not research or research not involving human subjects, an HSR # is assigned.

4. If the project is deemed "research" requiring IRB approval, exemption, or deferral, an HSR # is assigned, and the investigator will submit a protocol along with either a **"Request for New Protocol Approval" CDC Form 1250**, a **"Request for Exemption Determination" CDC Form 1255**, or a **"Request for Deferral of New Protocol" CDC Form 1256**.

5. The protocol and cover form are then reviewed by the EPO supervisor, Branch Chief, and Division ADS, who will submit to the EPO OADS. The Division ADS will ensure that a HSR Triage Form (http://www.cdc.gov/od/ads/hsrchklist.htm) is completed for each protocol submitted.

6. The EPO OADS will submit to the CDC Human Subjects Activity (HSA) who will assign the protocol to the CDC **Institutional Review Board (IRB)** for approval. IRB may request more information from the investigator before final approval.

When should a project be submitted for human subjects review?

In general, if an investigation or evaluation takes more than one day of an investigator's time, it is a good idea to consult the EPO supervisor to see if it needs to undergo human subjects review. It is generally a good idea to submit a request for an HSR tracking # for your project if you are unsure of whether it is research. Examples of projects that need to undergo human subjects review include focus groups, outbreak investigations, intervention studies, or formal research.

Note: Epidemic Intelligence Service (EIS) Officers can submit HSR number requests directly through The Epidemic Information Exchange System (*Epi-X)*. The officers must obtain a digital certificate to put on their computer and be registered by *Epi-X* administration in order to do so. Training on how to use and sign onto *Epi-X* will be provided by *Epi-X* staff in the Office of Scientific and Health Communications (OSHC) in EPO through the EIS program.

Criteria for IRB Approval of Research (45CFR46.111)

- Risks to subjects are minimized
- 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
- Selection of subjects is equitable
- Informed consent will be sought from each prospective subject or the subject's legally authorized representative
- Informed consent will be appropriately documented
- When appropriate, the research plan makes adequate provision for monitoring the data collected to ensure the safety of subjects
- When appropriate, there are adequate provisions to protect the privacy of subjects and to maintain the confidentiality of data
- Additional safeguards have been included for vulnerable populations, such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons

References

EPO Overview of Scientific Procedures (www.cdc.gov/epo/ads/index.htm)

CDC Procedures for Protection of Human Research Participants 2002 (www.cdc.gov/od/ads/hsrdocs.htm)

Contact Information

Office of the Associate Director for Science
Epidemiology Program Office
Centers for Disease Control and Prevention
1600 Clifton Road NE, MS-C08
Atlanta, GA 30329
(404) 639-3683
(http://www.cdc.gov/epo/ads/index.htm)

Epidemiology Program Office
Centers for Disease Control & Prevention

Human Subjects Review Quick Reference Guide

CDC
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EPO Human Subjects Review (HSR)

When a project has been deemed research or an existing project becomes research, CDC is required by ***Title 45 Code of Federal Regulations Part 46: Protection of Human Subjects or 45CFR46*** (also known as the *Common Rule*) to evaluate risks and benefits to human participants and to ensure proper safeguards for human subjects. Any project that involves human participants, either through direct interaction or collection of identifiable data, may need to undergo human subjects review to determine whether it involves human subjects research.

HSR Tracking Number Request

The process begins with the principal investigator submitting a request for an HSR tracking number.

1. Investigator sends a request for a HSR tracking # as early as possible in a project to the EPO supervisor with the following information:
   - Name of person submitting project
   - Date submitting request
   - Project title
   - Date activity began
   - Project description (to include the nature of the problem being investigated, type of investigation or response, population affected, and objectives of the project)

2. EPO supervisor forwards the request along with the following information to the EPO Office of the Associate Director for Science (OADS) HSR mailbox (adsreview@cdc.gov).
   - Decision Maker
   - Decision Code*
   - Date Request Received from Investigator
   - Date of Decision
   - Explanation of Decision

***Decision Code Categories**

1. Problem evaluation and control	4. Research
2. Surveillance Activity	5. Other
3. Program Evaluation	

What is research?

The ***Common Rule*** defines ***research*** as "a systematic investigation, including research development, testing and evaluation, **designed** to develop or contribute to **generalizable knowledge**." On the other hand, the main goal of ***Nonresearch*** is to enhance the well-being of an individual patient or community. Noresearch may employ the same scientific method as research, but is not designed to test an hypothesis or to generate generalizable knowledge. Nonresearch may include **disease control activity**, **public health surveillance** and **program evaluation activity**.

Exempt Research (See 45CFR46.101B for detailed descriptions)

Some human subjects research may be exempt from IRB review. Research that may be exempted includes those:

- Conducted in established or commonly accepted educational settings, involving normal educational practices
- Involving the use of educational tests, **survey procedures**, interview procedures or observation of public behavior and posing no potential harm
- Involving the collection or study of **existing data**
- Designed to study, evaluate, or otherwise examine public benefit or service programs
- Taste and food quality evaluation and consumer acceptance studies of wholesome foods

Special populations identified are not exempt under 45CFR46.

Expedited Research

Under an expedited review procedure, the review is carried out by the IRB Chair or the Chair's designee, without waiting for a scheduled meeting. Research may be eligible for expedited review if it meets all of the followings:

- The research activities present no more than minimal risk to human subjects;
- The data collected in the research are non-identifiable; and
- The research involves well-accepted and usual procedures (e.g., collection of blood samples by finger stick, heel stick, ear stick, or venipuncture).

Submit a **"Request for New Protocol" CDC Form 1250** along with the protocol and attachments.

Continuation

Research is subjected to annual review and expires one year from the date of approval. The investigator must submit a **"Request for Continuation of Protocol" CDC form 1251** to IRB for re-approval of the study if it continues beyond the one year. Continuation request must be submitted to CDC IRB 45 days before the protocol expiration date. Two reminders are sent to investigators at 60 days and 30 days before the expiration date.

Amendment

Any major changes to the original protocol (e.g. changes in PI, consent letter, major activity changes) must be reported to the IRB for approval. No activity can be conducted before approval. A **"Request for Amendment" CDC form 1252** must be submitted to IRB along with the protocol and attachments, noting the changes. A request to change or add investigator(s) can be made without an official amendment request by notifying the CIO human subjects contact. For EPO staff please submits your request to Aun Lor (alor@cdc.gov).

Termination

Protocols are terminated at expiration date if a continuation request is not received before the expiration date. CDC requests that investigator submits a **"Request for Termination of Protocol" CDC form 1253** when a project is completed.

Deferral of IRB Review

CDC is willing to consider relying on another IRB covered by an OHRP assurance based on the following criteria: the study involves no more than minimal risk and does not address a controversial topic, CDC did not originate nor control development of the protocol, and CDC investigators do not have any direct interaction with study participants. Other criteria are also considered (See section on Deferral of IRB Review in the *EPO Overview of Scientific Procedures* for more details). Use **CDC form 1256.**

Protocol Submission

Electronic copies are preferred, although hard copies are acceptable. Four copies are needed if submitted in hardcopies.

IRB Submission Forms

Submission forms are available through the CDC ADS Website (http://www.cdc.gov/od/ads/hsrirb.htm).

Expected Timeline

(from time received by CDC HSA)

Type of Review	Expected Timeline
Exemption and deferral	2-4 weeks
Expedited	3-4 weeks
Continuation	3-4 weeks if expedited, 7-10 weeks for full board
Amendment	3-4 weeks for minor amendment, 7-10 weeks for other than a minor amendment
Full board	7-10 weeks

Protocol Preparation

Generally, the following protocol format is suggested as a guide. Some of the information listed may not be relevant to a project, and others may need to be included.

- Project Overview
- Introduction
- Procedures / Methods
  - Design
  - Study Population
  - Variables / Interventions
  - Data Handling and Analysis
  - Handling of Unexpected or Adverse Events
  - Dissemination, Notification, and Reporting of Results
- References
- Appendix Materials

Please include the following information in your protocol (some indicated by * may/may not apply).

- CDC investigator's role
- Risks
- Methods to minimize risks
- Anticipated benefits
- Risk/Benefit Ratio
- Documentation of informed consent (see below)
- Protection of privacy and confidentiality
- *Vulnerable populations addressed
- *Justification for waiver/alteration of informed consent
- *Documentation of assent for children
- *Documentation of parent's/guardian's permission
- *Assurance/certificate of confidentiality
- Other relevant materials

Informed Consent

An important part of the protocol is the informed consent statement, which ensures that the persons who participate in research have the opportunity to choose whether to participate. It should provide the participants with complete information (see below) about the project so that they fully understand the ramifications of the research, and are able to make informed decision to participate without coercion and undue influence.

- Purpose and Procedures
- Risks & Benefits
- Alternatives to study participation
- Confidentiality
- When there is greater than Minimal Risk
- Persons to contact for information about study and rights related to human subjects protection
- Voluntary participation, Refusal, and Withdrawal

Be sure to include the reading level when submitting to IRB. Reading level needs to be at a level appropriate to the study population.

Additional Elements of Informed Consent

When appropriate, the following six additional elements of consent should be included:

- Unforeseeable risk
- Termination of participation without consent
- Additional costs to participant
- Consequences and process of withdrawal
- Impact of significant new findings
- Number of participants