The Role of Institutional Review Boards

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Overview

• The need for oversight
• Responsible parties
• IRBs (aka, REBs, RECs, etc)
Early Protections

- Self-experimentation
- Great attention to minimization of risk
- Distinctions between normal volunteers and patient-subjects with respect to consent
US Scandals

Medical Research
- Willowbrook Hepatitis Experiments
- Jewish Chronic Disease Hospital Cancer Experiments

Behavioral Research
- Obedience to Authority Experiments
- Tearoom Trade Study
Willowbrook Hepatitis Experiments

- Inoculation and injection of hepatitis
- Institutionalized children
- Admission through the research unit
Jewish Chronic Disease Hospital Cancer Experiments

- Injection of live cancer cells
- Hospitalized elderly patients
- Patients not told of live cancer cell injection
Ethics and Clinical Research

- Henry Beecher
- Chronicles 22 ‘unethical’ studies, from publications in respected medical journals
- Published in the *NEJM* June 1966
US Public Health Services Study of Untreated Syphilis in the Negro Male

- Often referred to as the “Tuskegee Syphilis Study”
- Poor, rural community
- Initiated as a natural history study when there were no effective treatments,
- Promise of “funeral benefits”
- Effective treatments (penicillin) arose in course of study, but not made available to subjects
The Need for Oversight

• Many research scandals emanated from practices that did not meet current standards and prospective review might have avoided the occurrence

• Independence may serve as a check on the enthusiasm of investigators and sponsors

• Randomization with masking (or blinding or concealment) poses special issues for providing protection for those enrolled in these trials and in properly interpreting adverse events
Responsible Parties

- Investigators
- Sponsors
- Institutions
- DMCs
- IRBs
The I in IRBs

• Assumption that ethics is local and that local oversight would be the best means of ensuring the protection of research participants

• Concern about bureaucratic hassles that would be associated with a centralized review
US Federal Policy Jurisdiction

• All research involving humans conducted, supported or subject to regulation by any Federal Department or Agency.

• State and local laws also pertain, particularly where these laws provide for added protections of subjects.
Late at night, and without permission, Reuben would often enter the nursery and conduct experiments in static electricity.
• **Research**: A systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge.

• **Intervention**: Includes both physical procedures and manipulation of the subject or his environment for research purposes.

• **Human subject**: A living individual about whom an investigator…conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information.
IRB Membership

- At least 5 members
- Diversity of the members
  - race
  - gender
  - cultural
  - profession/specialty
  - members who are not clinicians or scientists
  - members who are not from the Institution
IRB Membership

• Sensitive to needs and concerns of the community
• Sensitive to special issues concerning vulnerable populations (e.g., prisoners)
• May invite people with special competence to provide advice.
Criteria for IRB Review

- Risks to subjects are minimized
- Risks are reasonable in relation to anticipated benefits
- Selection of subjects is equitable
- Informed consent
- Monitoring
- Confidentiality
• Except for expedited reviews, proposed research is reviewed at convened meetings at which a majority of the members are present, including at least one member whose primary concerns are in nonscientific areas.

• IRB shall provide continuing review at intervals appropriate to risk as determined by the IRB-at least yearly.
Expedited Review: When?

- Includes projects where the risk to subject are no more than minimal  OR
- Minor changes in previously approved research
Definition

- **Minimal Risk**: The probability and magnitude of harm or discomfort anticipated in the research are not greater than those ordinarily encountered in daily life or during the performance of routine physical or psychological testing.

- Federal regulations describe minimal risk procedures but, ultimately, the IRB must confirm these and is limited to that list.
Expedited Review: Who?

- Expedited review may be done by the Chair or an experienced member but there must be a way to provide the IRB with protocol information and the results of the review.
Suspension of IRB Approval

- IRB approval may be suspended if there is undue harm to subjects or evidence of not following IRB rules
- If IRB suspension occurs, the IRB must document the reason, notify investigator, institutional officials and the government
Removing the I from IRB?

• Inherent conflicts of interest with institutional review
• Level of expertise may exceed that of the institution
• Multicenter trials more common
  – Multiple reviews can be confusing and unnecessary
  – Difficulty with conducting meaningful continuing review
Concluding Comments

- The US policy regarding IRBs focuses on the procedures for review.
- Although investigators and sponsors retain significant moral responsibility for protecting the rights and interests of participants in research, such ‘external’ approaches are positioned to provide additional protection.