ATTACHMENT II: Task Force Reviewing and Recommending Comment to the Systemwide Report on Institutional Review Boards (IRB)

Summary of the Report Submitted for Comment
The report was initiated to inquire into the operations of the Institutional Review Boards (IRBs) within the UC system. Broadly, the charge of an IRB is to protect human subjects by ensuring that the benefits of the research outweigh the risks, that subjects have given informed consent, and that the selection of subjects is done equitably. The Academic Council saw the need for an inquiry after a growing number of reports of IRB interference with faculty research.

Task Force Review and Comment of Recommendations
Recommendation 1: Increase Funding for Staff Augmentation and Training
The Task Force agrees with the recommendation but further suggests further quantification of “adequate resources.” Also, the Task Force believes that the practice of “recharging investigators for protocol review as a means of sustaining IRB operations cannot be universally rejected unless some current practices are eliminated.

Recommendation 2: Facilitate Systemwide Coordination in Training
The UCSF Task Force supports this recommendation. Systemwide training programs for IRB staff could, indeed, promote greater coordination among campus offices and facilitate standardized interpretation of federal regulations.

Recommendation 3: Establish a Forum for the Systemwide Discussion of Major Issues in Human Subjects Research
The UCSF Task Force believes that the statement “IRB review procedures are unnecessarily opaque and are not accommodating to the diverse domains of academic research” is vague. Taskforce committee members identified forums that already exist and noted that UC faculty should be made more aware of these existing forums.

Recommendation 4: Evaluate Electronic Submissions and Review Tracking Systems
The UCSF Task Force strongly supports development of electronic submissions and review tracking systems.

Recommendation 5: Establish Mechanisms for Local Campus Oversight of IRB Operations
The UCSF Task Force agrees with the recommendation for campus oversight. We suggest that a committee be instituted that could serve as a forum for complaints. Reports from this committee could be submitted to the VCR and the Academic Senate Committee on Research.

Recommendation 6: Cultivate Greater Faculty Familiarity with Human Subjects Protection Issues and the IRB Review Process
The Task Force agrees with this recommendation and suggests that an on-line education courses be developed that would be required before submission of a first IRB or every five years.

Recommendation 7: Encourage Faculty Recruitment and Recognition of Service on IRBs
The Task Force agrees with this recommendation.

Recommendation 8: Contribute to the Discussion of IRB Reform at the National Level
The Task Force agrees with this recommendation in principle, but encourages the development of a more specific plan deals more directly with the differences between social scientific protocols and biomedical protocols.

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