The concept of an HRPP captures the idea that many components of an institution that are involved in human subjects' research are responsible for the protection of the rights and welfare of those subjects, not just the IRB.

The industry standard defines a Human Research Protection Program as **"a shared responsibility for the welfare of subjects in research, involving multiple components, filling in the myriad gaps surrounding the jurisdiction of the IRB. With all such components interconnected properly, a "safety net" is formed to help ensure the optimal protection of the rights and welfare of the subjects."** *Source: IRB Management and Function, Third Edition, Chapter 1-2*

When it recognizes the multiple systems and processes needed to conduct responsible research, an institution can better tie the components together into a cohesive unit with a shared mission and goal and is in a better position to clarify the respective roles and responsibilities of, and improve communication among, those components. These components may include:

- The IRB of record
- Investigators and key study personnel
- Senior organizational leadership
- Department chairs
- Departmental scientific review committees
- Corporate Compliance
- Safety Committees
- Pharmacy
- Grants/contracts
- Billing/coverage analysis
- Conflict of Interest Committee
- Risk-Based Quality Monitoring
- Legal Department
- Community Outreach
- Education

Human subject protection is a system of ethical principles disseminated through Federal and state laws and local institutional policies, carried out by investigators and IRBs, overseen by departments, safety committees, and oversight agencies, all of which work together to safeguard the rights, welfare, and privacy of humans participating in research.

All human subjects research conducted at Children's Wisconsin must have approval from an IRB designated by the Children's Institutional Official.

Change of IRB of Record Notification Memo

What does the CW HRPP do?

The scope if the IRB of review focuses on determining whether a research project meets regulatory criteria of approval, and after approval, overseeing the study from a regulatory perspective until it closes.

Scope: Children's Wisconsin applies its HRPP to all research regardless of funding source, type of research, or place of conduct of the research. The organization exercises these responsibilities through relationships with researchers and research staff, IRBs, sponsors, participants, and the community. The CW HRPP will be part of the review of any research being conducted in CW space, with CW resources, or involving CW patients.

Components: CW HRPP is made up of a variety of components working together to protect subjects of research happening at CW.

- CW institutional official
- IRBs of record (MCW or another sIRB)
- HRPP office and staff
- CW Director of Clinical Research Operations
- Investigators and research staff
- IRBs of record
- Grants and contracts
- CW Pediatric TRU
- CW Legal counsel
- CW Corporate/Research compliance
    - HIPAA privacy office
    - Manage CW privacy board
    - Billing/coverage analysis
    - COI and CW data management
    - EPIC access
- CW ancillary services
    - Department or scientific review
    - Institutional Biosafety Committee
    - Radiation/MRO Safety Committees
    - Laboratory services
    - CW pharmacy/investigational drug service
- Nursing Research
- Any CW department, clinic, or hospital space involved in research.

Institutional Policies and Local Context: It is the expectation of the Children's Wisconsin HRPP that the IRB of record and investigators will follow Children's Wisconsin HRPP

policies and local context requirements and practice and will ensure consistency when making regulatory determinations if Children's Wisconsin HRPP policy does not conflict with applicable federal regulations.

Local Context: Local context review, conducted by the CW HRPP informs the IRB of institutional requirements that need to be taken into consideration as the study is reviewed by the IRB. A local context review needs to occur at the local site (CW) and information is then provided to the reviewing IRB. This includes verification that the site-specific information is incorporated appropriately in applicable study documents. It also is the process through which the local site verifies it has performed its relying site responsibilities as outlined in the reliance agreement. Local context review must be complete before final approval and before research can begin at CW.

Local context review generally includes, but is not limited to, study-specific confirmation of:

- Study plan adheres to institutional policies, applicable laws, and local standards.
- Confirmation that all pre-submission requirements of CW are complete (for example if a pre-submission meeting with the PI is required)
- Investigators and study staff are appropriate for type of research; have required training; are operating within scope of practice.
- Ancillary reviews such as CW safety committee reviews and review by applicable CW departments\
- Conflicts of interest disclosure review and management
- Studies are feasible and appropriate.
- Adequate resources are in place to conduct in Children's Wisconsin space.
- Community and subject population are appropriate.
- Appropriate local consent language is included in Consent/Assent/Parental Permission documents.
- Local HIPAA/Privacy Board (when required) and C W Research Compliance review.

CW HRPP activities: When a project, or any subsequent submission related to a particular research project, is submitted in eBridge for IRB review, the submission will automatically be routed to CW HRPP for local context review (called Ancillary Review), which will occur before the project moves on for IRB pre-review and review and approval by the MCW pediatric IRB, or another IRB in a reliance request. At the stage of local context review, the CW HRPP analysts and CW Corporate Compliance may have questions or required modifications. This will be communicated via the eBridge platform.

The activities of the CW HRPP office and any other applicable CW HRPP component include but is not limited to:

- Conduct the local context review of all submission types submitted for IRB approval and being conducted at CW, with CW patients and/or CW resources.
- Establish and enforce policies and procedures (outside those of the IRB of record)
- Review requests for engagement/not human subjects research determinations.
- Conduct QA/QI/Post Approval Monitoring activities.
- Provide local context interpretations outside reg criteria to ensure consistency.
- Has authority to disapprove, suspend, terminate research
- Has authority to rely on other IRBs
- Review exempt determinations.
- Review Emergency Use/Expanded Access requests.
- Provide continuing education/educational support and guidance to researchers and study teams.
- Manage noncompliance and corrective action plans.
- Establish management plans for conflicts of interest (IRB of record reviews management plans)
- Manage investigational products in CW space.
- Conduct community outreach activities.

IRB of Record Activities	CW HRPP Activities
• Approve human subject research (including renewal of human subjects research prior to the expiration date determined by the IRB) • Require modifications to human subject research. • Disapprove human subjects research. • Grant waivers related to Consent/assent/parental permission. • Grant waivers related to HIPAA authorization (if also serving as the privacy board for an institution, in some cases the CW Privacy Board will assume this function) • Determine if reported non-compliance is serious or continuing. • Determine if reported problems or adverse events constitute an Unanticipated Problem Involving Risk to Subjects or Others (UPIRSO) **Note:** an IRB is serving the institution in which the research is being conducted. An institution either has its own IRB, OR it decides on which IRB to rely for the above regulatory determinations. It is the IRB's responsibility to be aware of and take any institutional policies, requirements, practice (i.e Children's Wisconsin local context) into consideration when reviewing research to be conducted at that institution.	The activities of the CW HRPP office and any other applicable CW HRPP component include but is not limited to: • Conduct the local context review of all submission types submitted for IRB approval and being conducted at CW, with CW patients and/or CW resources. • Establish and enforce policies and procedures (outside those of the IRB of record) • Review requests for engagement/not human subjects research determinations. • Conduct QA/QI/Post Approval Monitoring activities. • Provide local context interpretations outside regulatory criteria to ensure consistency. • Has authority to disapprove, suspend, terminate research • Has authority to rely on other IRBs • Review of exempt determinations • Review and approve Emergency Use/Expanded Access requests. • Provide continuing education/educational support and guidance to researchers and study teams. • Manage noncompliance and corrective action plans. • Establish management plans for conflicts of interest (IRB of record reviews management plans) • Manage investigational products in CW space. • Conduct community outreach activities.

HRPP compared to an IRB:

This is based on the AAHRP accreditation domains. Please see the CW SOP manual for further details on these domains.