# Forming an Institutional Review Board at a Community College

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There are a number of reasons that a community college may wish to form an Institutional Review Board (IRB). Chief among these is the desire to have a consistent process for vetting and responding to research requests from academics and from graduate students. Another reason to seek an IRB is that some institutional grants (e.g., from the National Science Foundation) may require that the applicant include their institutional Federalwide Assurance number (FWA), which is a certification that the institution has an active IRB in place.

There are several steps to forming an IRB, which are laid out below:

**Identify a chairperson for the IRB**

This will typically be the chief research officer for the college or a related position. This person will be responsible for identifying other members of the IRB, convening and chairing meetings, determining if research requests are exempt, and reviewing and responding to exempt research requests, as well as interfacing with the federal agencies that certify and monitor IRB membership and activity.

**Identify at least four other IRB members**

The IRB will need a minimum of five members (including the chairperson). It is also desirable to have two or more alternates who can are ready to participate if an IRB member is unable to attend a session. Keeping the IRB to the minimum size may facilitate the convening of the Board. IRB members should be drawn from the faculty with the exception that at least one member of the IRB needs to be a community member who is not employed by the college or district. A typical configuration would be two faculty members from science-oriented disciplines (e.g., math, social science, engineering, etc.) with one non-scientist faculty member. It is required that an IRB have at least one faculty with a non-science background (e.g., art, dance, English, etc.). Note that IRB members should be required to undergo the free, online human subjects training and certification offered through the OHRP.

**Apply for an IRB number**

Once the IRB members have been identified, you should file a new registration for an Institutional Review Board with the Office of Human Research Protections (OHRP) under Health and Human Services. Note that unless you plan to run clinical drug trials, you will not need your IRB to be certified with the FDA (which requires extra steps). You can begin the online process here:

http://ohrp.cit.nih.gov/efile/IrbStart.aspx

**Apply for a Federalwide Assurance Number**

Once you have completed the IRB registration process and the OHRP has assigned you an official IRB number, you can then apply for a FWA at the following website:

http://www.hhs.gov/ohrp/assurances/assurances/file/index.html

Note that you may wish to check the OHRP database to ensure that an FWA has not previously been assigned to your institution (do that here: http://www.hhs.gov/ohrp/assurances/status/index.html). If it has, then you would go through the update/renewal process instead of applying for a new FWA.

**Establish procedures and meeting times**

The newly formed IRB should establish regular meeting times in order to facilitate scheduling. The number of meetings will vary according to demand, but the group should plan to meet at least once each semester. Often research projects arrive with short deadlines and having a pre-ordained meeting time for the IRB can help speed turnaround. Procedures will need to be established for:

- Receiving applications to conduct research
- Establishing "exempt" or "expedited" status of certain research projects
- Reviewing informed consent
- Ensuring that special populations are adequately protected
- Keeping minutes at IRB meetings, etc.

As you establish policies and procedures around your IRB, the following links should prove helpful:

The American Psychological Association (APA) explains IRBs
http://www.apa.org/research/responsible/irbs-psych-science.aspx

The Belmont Report: Ethical Principles and Guidelines for the Protection of Human Subjects of Research
http://www.hhs.gov/ohrp/humansubjects/guidance/belmont.html

Federal Regulations (aka "Common Rule") regulating Human Subjects research
http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html

The Office of Human Research Protection's IRB Guidebook
http://www.hhs.gov/ohrp/archive/irb/irb_guidebook.htm