Memo: Human Subject Research Compliance  
(As of Sept 18, 2012)

For an archive of announcements sent from the Provost’s Office beginning June 2011, see  
http://www.baruch.cuny.edu/provost/archive.htm

This memo reaffirms that all research projects at the college involving human subjects must be reviewed by the CUNY-wide IRB (the CUNY University Integrated Institutional Review Board -CUNY UI IRB) or by Baruch’s own Human Research Protection Program Office (HRPP Office). All researchers should understand the scope and importance of this requirement and the possible consequences of failure to comply.

What must be reviewed?
All research projects involving human subjects (including opinion questionnaires) by members of the faculty, administration, staff, and students are subject to review. Some activities, such as surveys given to students that are used only to develop curriculum, do not fall under the federal definition of research. The HRPP Coordinator, not the Principal Investigator (PI), determines whether a research study meets the criteria for exemption from IRB review. Researchers may not initiate exempt research until and unless they have received a determination of exemption from their local HRPP Office. To receive an exempt determination from the HRPP Office, researchers must submit a request for exemption form via IRBNet (www.irbnet.org). This form can be found in the Forms and Templates link under Other Tools on IRBNet. For IRBNet submission instructions please go to the Baruch HRPP Office Website (http://www.baruch.cuny.edu/hrpp/index.htm).

Research involving human subjects can come from any department. Faculty members are often surprised by the scope of what constitutes human-subject research. Attached is the CUNY HRPP guidance document entitled “Activities Requiring CUNY HRPP or IRB Review,” which gives examples of the types of research activities that require IRB or HRPP review.

Some consequences of failure to comply

- For research projects involving human subjects, the CUNY Research Foundation will not release grant funds without IRB approval.
- Researchers who fail to follow procedures might be forbidden to publish the results.
- Researchers who have failed to obtain IRB approval and who are sued as a result of their project activities are personally liable. They will not qualify for legal support from the college or the university.
- Careless IRB practices at any unit of CUNY may result in the entire university losing the right to conduct research.

As the college works to expand its support for faculty research, the CUNY UI IRB will play an increasingly important role. The regulation and oversight of research involving human subjects has become much more stringent in the past few years. As a consequence, CUNY and its Research Foundation hold the colleges to a much higher standard of compliance. It is essential that we continue to educate ourselves about our responsibilities as researchers and to provide guidance for the development of project designs.

What does compliance entail?
For IRB deadlines, materials, resources, and advice, please go to the Baruch HRPP Website:  
http://www.baruch.cuny.edu/hrpp/index.htm or contact Keisha Peterson, HRPP Coordinator. The Coordinator’s contact information is as follows:  
Keisha Peterson  
Baruch College Human Research Protection Program (HRPP) Office  
137 E25th Street - 10th Floor  
Room/ Box J-1028  
New York, NY, 10010  
Telephone: 646-312-2217
Thank you for your attention to these matters,

John Brenkman
Interim Provost and Senior Vice President for Academic Affairs

Keisha Peterson
Human Research Protection Program (HRPP) Coordinator