AAHRPP Accreditation Spotlight

To achieve AAHRPP Accreditation, the institution’s HRPP (POP QUIZ – What does HRPP stand for? See below*) must meet the AAHRPP Accreditation Standards. These Standards are used to evaluate the quality and level of protection that an organization provides research participants.

In addition to the AAHRPP Evaluation Instrument for Accreditation, AAHRPP has developed “Tip Sheets” to provide additional guidance and information on what should
be included in your HRPP. The Tip Sheets are designed to be flexible. As stated by AAHRPP, "As long as you provide the required content, the format of your Organization's policies and procedures could differ from the Tip Sheets."

For example, Tip Sheet #1 is an overview for the IRB Criteria for Approval. This Tip Sheet not only cites the regulatory basis for the criteria but provides a detailed explanation of how the criteria may be satisfied. You can check out all of the AAHRPP Tip Sheets here.

*HRPP = Human Research Protection Program

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**GDPR**

The GDPR is here! You may be thinking to yourself, “How is my friendly IRB office helping the research community be compliant with the GDPR?” In case you are, here is what we’ve been up to:

**GDPR-compliant informed consent language** - When research is to be conducted on personal data of research subjects who are located in the EEA, the HUA IRB has included GDPR language in each of the template consent materials: adult consent, a parent/guardian permission for research involving children as research subjects, child assent form, and exempt study consent script.

**Notifying researchers if their study may be subject to GDPR** – We have been flagging existing studies in our system and placing a note that is sent to the research team. For new IRB submissions, we are giving a heads-up to the researcher that GDPR might apply.

**Updated Resources** - The Harvard University GDPR Working Group has developed a website with some background and guidance on Harvard's response to the GDPR
which is behind Harvard Key login. Check it frequently as information continues to be added. Additionally, visit the [EU GDPR Portal](#).

**Questions? We’re here to help** - If you have any general questions about GDPR or wish to speak to someone regarding whether your research activities require GDPR compliance, please contact your [department-assigned IRB Reviewer](#).

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**URTP Summer Undergraduate Training Dates**

The Undergraduate Research Training Program (URTP) is a comprehensive platform to create better prepared undergraduate researchers. The URTP is comprised of research ethics training sessions, a student-focused curriculum, and an online decision form that will assist students in determining whether their project requires IRB review.

If you are an undergraduate (or know an undergraduate) who missed some of our Spring 2018 training sessions, fear not! The URTP will be holding Summer 2018 training sessions on the following dates:

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wednesday, June 6</td>
<td>4:00 – 5:30 pm</td>
<td>William James Hall, Rm 305</td>
</tr>
<tr>
<td>Tuesday, July 10</td>
<td>5:00 – 6:30 pm</td>
<td>William James Hall, Rm 306</td>
</tr>
<tr>
<td>Thursday, August 9</td>
<td>4:00 – 5:30 pm</td>
<td>William James Hall, Rm 305</td>
</tr>
</tbody>
</table>
Do you speak IRB?

**Identifiability**

The level of data **identifiability** is a criterion of what constitutes a human subject however it is not always easy to discern what is considered identifiable or not. “**Identifiability**” also varies in definition across regulations. FERPA and HIPAA define **identifiability** according to the inclusion of specific variables while the federal regulations for human subjects define it as, “the identity of the subject is or may be readily be ascertained by the investigator or associated with the information.”

Generally, names, addresses, email addresses, and other unique identifiers are considered “identifiable”. Other unique identifiers may include medical record numbers, MTurk IDs, or other systems that directly link to an individual’s name/identity. Also, there may be a constellation of variables that may identify an individual. This constellation may occur within one dataset or when datasets are linked together by a common variable.

Identifiable data are people according to the federal human subject regulations. If the data involves prisoners, then the regulatory subpart (**Subpart C**) pertaining to prisoners must be applied; just as data from children would need to be reviewed according to **Subpart D**. If identifiable data are obtained without permission, the IRB would also need to consider the appropriateness of granting a waiver of consent. More on the waiver of consent and “practicable” can be found [here](http://calists.harvard.edu/mailman/listinfo/huairb).

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It’s easy! Just share this link with them:

[http://calists.harvard.edu/mailman/listinfo/huairb](http://calists.harvard.edu/mailman/listinfo/huairb)