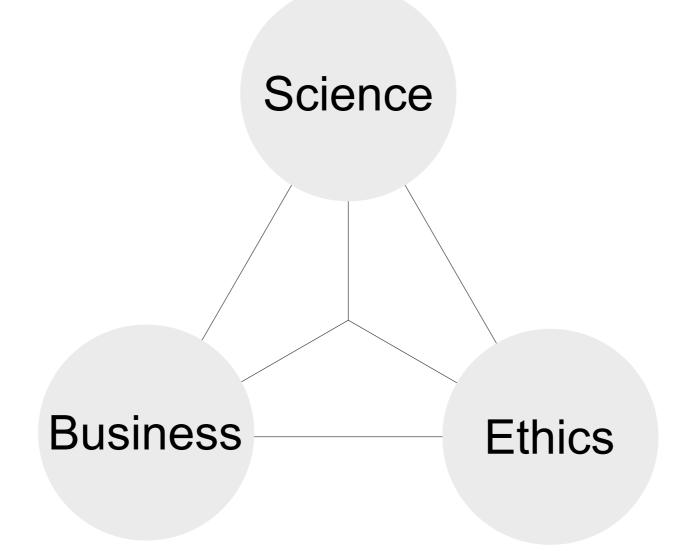
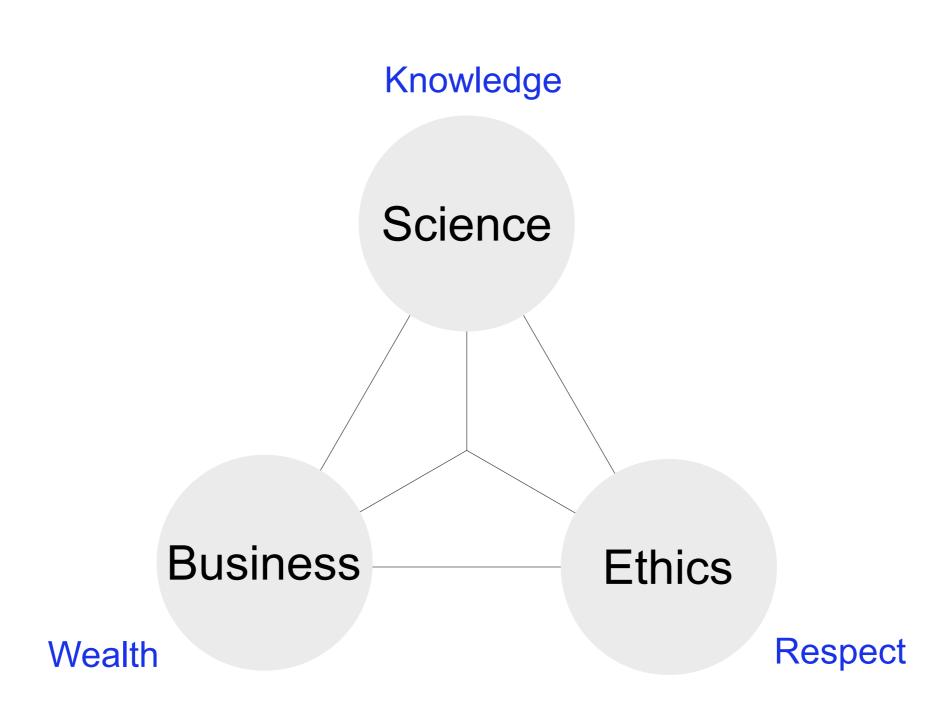
The case for a nonprofit independent IRB – improving the ethical review of research Stephen J. Rosenfeld, M.D., M.B.A.

### About me

- Internal medicine/hematology
- Clinical researcher at NIH
- CIO of the NIH clinical center
- CIO of MaineHealth
- CEO of Western IRB
- Executive Board Chair of Quorum IRB
- PRIM&R and AAHRP Boards
- SACHRP Chair



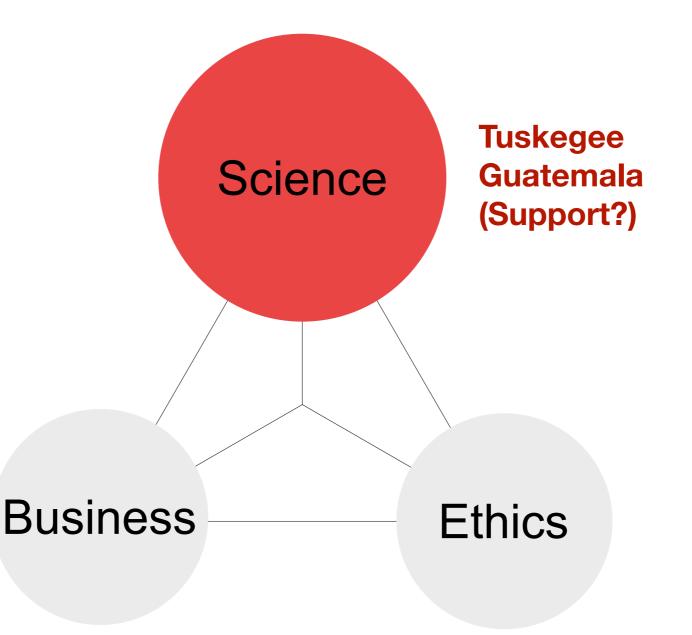


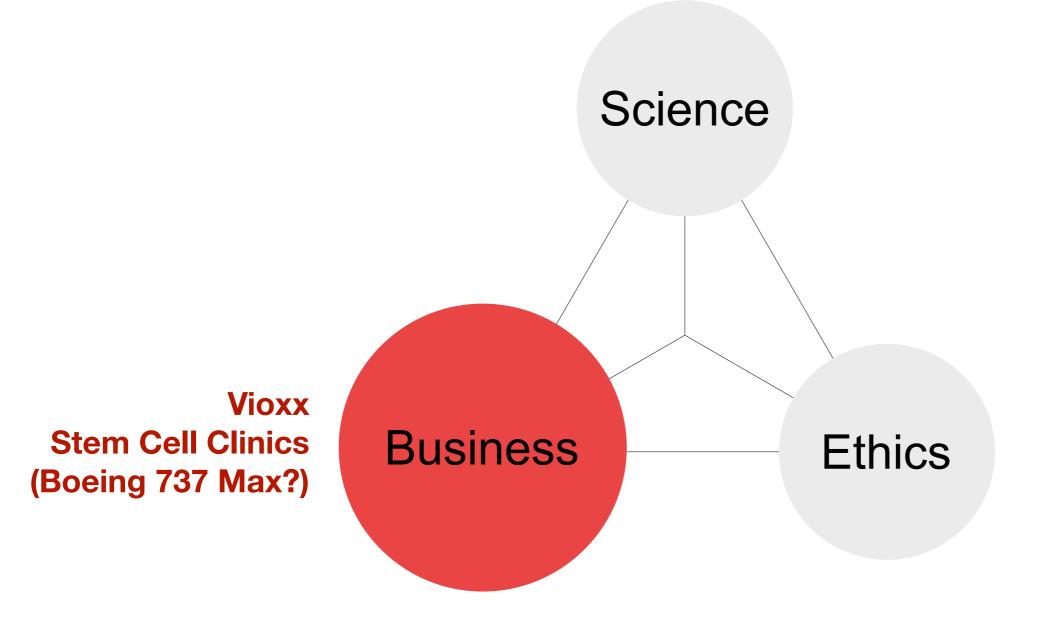
Technology

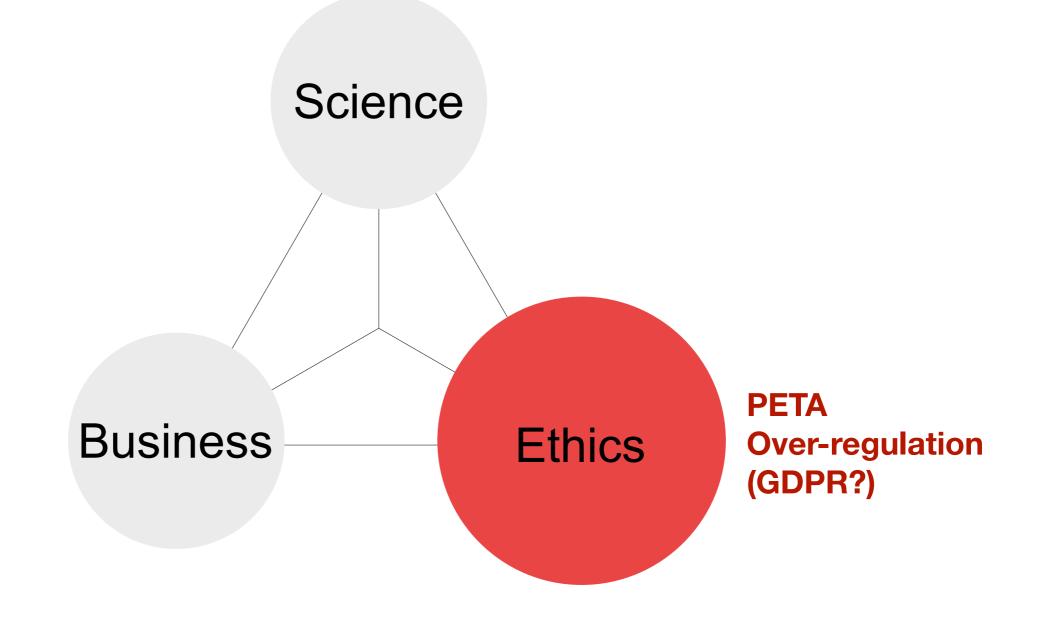
Knowledge

Science

Business Ethics Wealth Respect Innovation Public trust

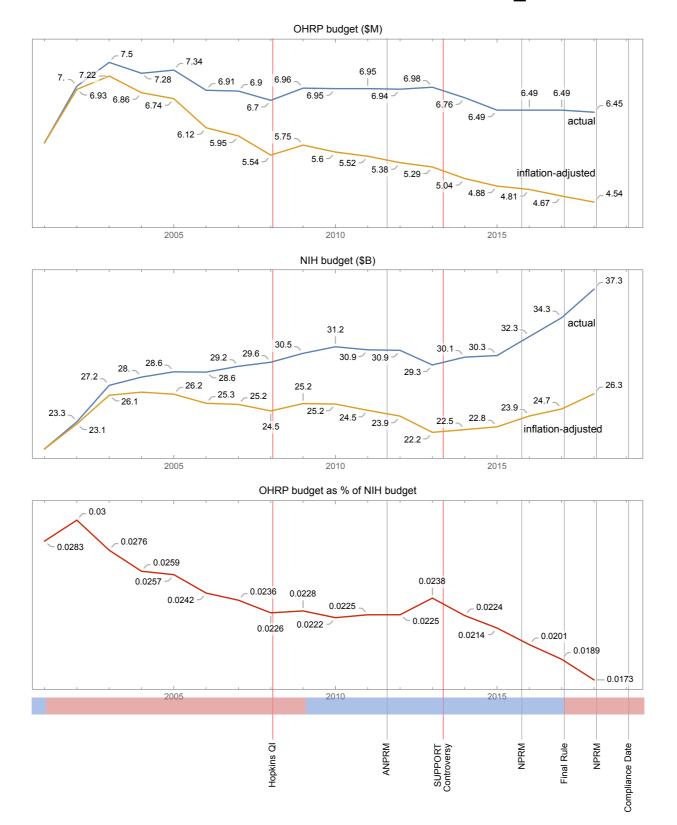






### State-of-the-IRB

- Not a learning system
- Opaque
- Quality v. process metrics
- Emphasis on compliance rather than ethics (loss of mission-focus), but...



- Regulations
  - Single IRB mandates
  - Impact on institutional IRBs/HRPPPs
  - Difficulty changing institutional staffing, budgets, processes
  - Leadership change is not seen as mission-driven

#### Research

- Genomics
- "Big data"
- Wearables and Apps
- Citizen science
- Decedents...
- And no more "box"

"Human subject means a living individual about whom an investigator (whether professional or student) conducting research: (i) Obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or (ii) Obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens."

- Independent IRBs
  - Investor-ownership
  - Competing fiduciary obligations
  - Consolidation and lack of competition
  - Focus on cost-cutting
  - Little reason to innovate
  - Business Roundtable...

# Proposal: nonprofit independent IRB

- Flexibility of a small business (independent)
- Fiduciary obligation to research subjects (nonprofit)
- Platform for innovation in quality, process, precedent, transparency, inclusion of the participant perspective ("learning IRB")
- and... financially self-sustaining