



UNIVERSITY OF CALIFORNIA, SAN DIEGO  
HUMAN RESEARCH PROTECTIONS PROGRAM

TO: Dr. Edward Cachay

RE: Project #171954  
Impact of direct acting antivirals uptake in controlling hepatitis C epidemic and modeling interventions for hepatitis C elimination among HIV-infected persons in San Diego

Dear Dr. Cachay:

The above-referenced project was reviewed and approved by one of this institution's Institutional Review Boards in accordance with the requirements of the Code of Federal Regulations on the Protection of Human Subjects (45 CFR 46 and 21 CFR 50 and 56), including its relevant Subparts. This approval, based on the degree of risk, is for 365 days from the date of **IRB review and approval** unless otherwise stated in this letter. The regulations require that continuing review be conducted on or before the 1-year anniversary date of the IRB approval, even though the research activity may not begin until some time after the IRB has given approval.

The IRB reviewed this study and determined that a waiver of informed consent was granted for the recruitment component of this project as this component of the research meets the following requirements as outlined in 45 CFR 46.116(d). This component is minimal risk; the waiver or alteration will not adversely affect the rights and welfare of the subjects; this component could not practicably be carried out without the waiver or alteration; and whenever appropriate, the subjects will be provided with additional pertinent information after participation. In addition, a partial waiver of individual authorization for use of Protected Health Information (PHI) was granted for the recruitment component of this research by the IRB as this component meets the requirements outlined by the HIPAA Privacy Rule, 45 CFR 164 section 512(I). The PHI determined necessary includes the following: patients enrolled at the UCSD Owen Clinic from January 1, 2018 to November 15, 2017 to Ascertain HCV Treatment status; ascertain characteristics of patients: Sociodemographics, HIV and HCV characteristics, cirrhosis status and concurrent medical comorbidities; if received HCV treatment: type and outcome; available standard of care HIV results per HCV clinic protocol; standard of care collected information relative to screening inventories for symptoms and risk behaviors (alcohol, substance use) and depression per the Owen Hepatitis Co-Infection Clinic.

The IRB determined that this project presents no more than minimal risk to human subjects in that the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.

**Date of IRB review and approval: 11/16/2017**

On behalf of the UCSD Institutional Review Boards,

A handwritten signature in black ink, appearing to read 'A Magit', with a stylized flourish at the end.

/mb

Anthony Magit, M.D.

Director

UCSD Human Research Protections Program

858-246-HRPP (858-246-4777); hrpp@ucsd.edu

Note: IRB approval does not constitute funding **or other institutional required approvals**. Should your studies involve other review committees such as Office of Clinical Trials Administration (OCTA), Office of Coverage Analysis Administration (OCAA), Conflict of Interest (COI), Protocol Review Monitoring Committee (PRMC), and committees under Environmental Health & Safety (EH&S) such as Institutional Biosafety Committee (IBC), Human Exposure Committee (HERC), and RSSC (Radiation Safety and Surveillance Committee), it is the researchers responsibility to ensure that all approvals are in place prior to conducting research involving human subjects or their related specimens.

Approval release date: 2/13/2018

## UCSD HUMAN RESEARCH PROTECTIONS PROGRAM

### GENERAL APPROVAL INFORMATION

The information below does not encompass all human subjects protections requirements, however, is intended to highlight those of significance to ensure awareness by researchers engaged in research involving human subjects or their related specimens and data.

#### Approval Letters and Consent Documents

Unless otherwise stated, approval letters will be accompanied by stamped, approved consents. Should a study be closed to accrual and no consent released as a result, this information will be documented on the approval letter. Also, any waivers will be documented in the approval letter (such as waiver of documented consent or waiver of authorization for use of PHI).

The PI must ensure approval is in place from other appropriate review boards (such as Radiation Safety, Institutional Biosafety Committee, Conflict of Interest, ESCRO, etc.)

If other institutions are involved, the PI must ensure that IRB approvals (or other administrative approvals) from those sites are secured and forwarded for the study file. In addition, PI's must ensure that the clinical trial agreement, as applicable, or other funding (such as a grant) is appropriately in place prior to conducting any research activities. IRB approval does not constitute funding approval.

#### Duration of IRB approval

The IRB may grant approval up to 365 days. (See 45 CFR 46.109(d) (DHHS) and 21 CFR 56.109(d) (FDA)). However, for some studies the IRB may grant approval for a lesser period or a specific number of subjects to allow for more frequent monitoring. The approval letter or related documentation will indicate this information.

Because IRB review of research studies must be completed at least annually, investigators should plan ahead to meet required continuing review dates. **Please submit complete continuing review documentation at least 45 days prior to the expiration date to guard against a lapse in IRB approval.** The signed continuing review facepages and any other required hard copies must be received by the HRPP office before the continuing review process can begin.

As a courtesy, automated continuing review reminders can be set-up by PIs at various intervals (75 days, 45 days, 30 days, for example) on the website at <https://irb.ucsd.edu>. However, as these are automated electronic messages based on data entered, and the HRPP cannot anticipate which type of software programs (such as spam-blockers or anti-virus software) may block receipt of the messages, **PI's are required to not rely upon notification, but have internal mechanisms which track continuing review submission times.** Ultimately, it is the PI's responsibility to initiate a continuing review application, allowing sufficient time for the review and re-approval process to be completed before the current approval expires.

Continuing review is required even if no changes are made, or if the only study activity is participant follow-up, and even if the only study activity is data analysis.

### **What happens if there is a lapse in IRB approval?**

If the IRB has not reviewed and approved a research study by the study expiration date, **all research activities must stop**. This includes the following:

All research-related interventions or interactions with currently enrolled subjects (unless the IRB finds that it is in the best interests of the individual subjects to continue participating in the research interventions or interactions;\*) recruitment and informed consent procedures; and continued collection and/or analysis of data/information.

*\*Exception:* Research-related interventions or interactions with enrolled subjects may continue if the IRB determines that stopping the research would jeopardize the rights or welfare of current subjects. The IRB will decide which subjects should continue receiving the intervention during the lapse in approval. A request for such an exception must be submitted in writing to the attention of the IRB Chair by the Principal Investigator. If any project activity—even activity required for participant safety—occurs or continues after the expiration date, the investigator is out of compliance with both federal regulations and university policy. Retrospective approval for work done after the expiration date cannot be granted.

### **Amendment/revision to an IRB approved study**

IRB approval is required before implementing any changes in the approved research plan, consent documents, recruitment materials, or other study-related documents. Please see Amendment Fact Sheet at <http://irb.ucsd.edu/amendmodchg.pdf> for submission guidance.

### **Adverse Event and Unanticipated Problems Reporting**

All problems having to do with subject safety must be reported to the IRB within ten working days. All deaths, whether or not they are directly related to study procedures, must be reported. For adverse events, please utilize the form found at [https://irb.ucsd.edu/UPR\\_biomedical.doc](https://irb.ucsd.edu/UPR_biomedical.doc). For deviations and other reports, a cover letter and any supplemental information appropriate to the review should be provided. Please see IRB Guidelines for more information at <https://irb.ucsd.edu>.

### **Changes in financial Interest or Conflict of Interest (COI) disclosure**

Any changes in the financial relationship between the study sponsor and any of the investigators on the study and/or any new potential conflicts of interest must be reported immediately to the Independent Review Committee via the Conflict of Interest Office. If these changes affect the conduct of the study or result in a change in the required wording of the approved consent form, then these changes must also be submitted as an amendment request.