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1. PURPOSE

- 1.1. This procedure establishes the process to manage allegations of undue influence of the HRPP.
- 1.2. This procedure begins when the [Institutional Official] learns of an allegation of undue influence of the HRPP.
- 1.3. This procedure ends when any undue influence of the HRPP has been mitigated.

2. POLICY

- 2.1. Staff may explain written procedures to individuals involved in the review process.
- 2.2. Individuals in the [Institution] may not
 - 2.2.1. Provide information beyond an explanation of written procedures that might influence or appear to influence the review process determinations made as part of the criteria for approval.
 - 2.2.2. Communicate the [Institution]'s financial issues regarding specific protocols to individuals responsible for the review process.
 - 2.2.3. Answer questions about the [Institution]'s business issues posed by individuals responsible for the review process where the answers might influence or appear to influence review decisions.
- 2.3. Individuals responsible for business development may not serve as IRB members and may not be involved in daily operations of the review process, and may not discuss business development with IRB members.
- 2.4. Attempts to unduly influence any individuals who are part of the review process is prohibited.
- 2.5. When the IRB does not follow written procedures, the [Institution] can require the IRB to re-review the submission and disapprove research approved by the IRB.
- 2.6. All individuals in the [Institution] are required to ensure that allegations of undue influence of the HRPP or review process are promptly reported to the [Institutional Official].

3. RESPONSIBILITY

- 3.1. The [Institutional Official] carries out these procedures or ensures that others carry them out.

4. PROCEDURE

- 4.1. Gather information to determine the veracity of the report using discretion regarding the most efficient and effective methods. Methods to gather information can include, but are not limited to:
 - 4.1.1. Interviews of individuals inside and outside the [Institution]
 - 4.1.2. Review of records inside and outside the [Institution]
 - 4.1.3. Consultation with internal or external entities
- 4.2. If the report has no basis in fact, take no further action under this SOP.
- 4.3. Take appropriate steps to eliminate the undue influence using discretion regarding the most efficient and effective methods. Steps may include, but are not limited to:
 - 4.3.1. No action
 - 4.3.2. Verbal counseling
 - 4.3.3. Education
 - 4.3.4. Reassignment of duties
 - 4.3.5. Termination of employment
- 4.4. Document the findings and actions, if any, related to undue influence of the HRPP.

5. REFERENCES

POLICY: Undue Influence of the HRPP

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- 5.1. 21 CFR §56.109(a), §56.109(f), §56.112, §56.113
- 5.2. 45 CFR §46.109(a), §46.109(e), §46.112, §46.113