

## RECRUITING AT OTHER INSTITUTIONS:

What can we do that *doesn't* require IRB approval for the recruitment site?

### BACKGROUND

According to the **Office of Human Research Protections** (OHRP), any institution that is **Engaged in Human Subjects Research** needs IRB review. Tufts Health Sciences IRB only has oversight over Tufts University, Tufts Medical Center, MelroseWakefield, and Lowell General.

OHRP has posted guidance on [Engagement of Institutions in Human Subjects Research](#) that explains when an institution is or is not **Engaged**. (We also have posted this guidance in [worksheet](#) form.)

### RECRUITMENT ACTIVITIES THAT DO NOT ENGAGE A SITE IN THE RESEARCH:

- ✓ Informing prospective subjects about the availability of the research
- ✓ Providing prospective subjects with IRB-approved information about the research (recruitment flyers, copies of the ICF)
- ✓ Informing prospective subjects how they can contact the investigators
- ✓ Getting the prospective subjects' permission for the investigators to contact them (including passing along the prospective subject's contact information, with their permission)

### ACTIVITIES THAT DO ENGAGE A SITE IN THE RESEARCH:

- ✗ Medical record review
- ✗ Screening
- ✗ Acting as representatives of the study team
- ✗ Obtaining consent for the research / Enrolling subjects
- ✗ Collecting data for the research

### BOTTOM LINE

If the recruitment site can identify prospective subjects *without* a medical record review, screening, or any other ✗ activities that **Engage** the site in the research, then the site doesn't need IRB approval in order to conduct ✓ activities that **don't Engage** it.

**You may still need permission from the site to recruit there!** Ask your collaborators at the recruitment site to touch base with their IRB office about what may be required. (*Note that if you are being asked to recruit for an external study, you **must** submit to the IRB for a formal determination.*)

For more guidance on IRB requirements for collaborative research, see [this slide deck](#) or [contact the IRB office](#).