

K-State Institutional Framework for Governance of DURC

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University Research Compliance Oversight

- · Research involving Human Subjects (IRB)
- · Research, testing, or teaching involving animals (IACUC)
- Research using recombinant or synthetic nucleic acid molecules, toxins, or infectious agents (IBC)
 - Select Agents and Toxins
- Export Controls Program
- \cdot Confidential/Sensitive Research
- \cdot Dual Use Research of Concern (IRE)



Policy Development at K-State

- Lead Office Associate Vice President for Research, Compliance (URCO)
 - Associate VP for Research nominated as ICDUR and assigned implementation responsibilities by Vice President for Research
- Began developing new internal policies and procedures in October 2014

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- Followed Companion Guide in process development
- Drafted internal SOPs and other documents, to include DURC Notification Form



Policy Implementation at K-State

- Created a completely new compliance committee
 - Mitigate administrative burden to existing IBC and committee members
 - Higher ranking members (Distinguished Professors, Deans, Directors) selected for IRE membership
 - Appointed by Vice President for Research
- IRE composed of 9 members, plus 4 *ad hoc* members on as needed basis
 - Ad hoc members Communications Department, Pre-Awards Services, EH&S Department, and General Counsel



Spreading the Word

- Held one-on-one meetings with K-State Principle Investigators known to be working with DURC agents prior to implementation of official policy
 - Good working relationship with all PIs
- Emailed IBC listserv DURC Policy, K-State SOP, and other materials
- Published media blurb in K-State Today week of implementation
- All KSU researchers are required to take Collaborative Institutional Training Initiative (CITI) training on DURC as part of their routine IBC application process (training is required every 3 years)



Implications for Research

- Only a few researchers at K-State working with DURC agents
 - Some researchers chose not to pursue research with these agents because of the policy (to include Gain of Function Moratorium)
 - Benefit versus burden analysis in working with DURC agents
- Impact on K-State? MINIMAL
 - Limited impact on existing research
 - Minimal impact on new research
 - Limited administrative burden for URCO

Could change with new funded DURC research



Lessons Learned/Challenges

- Unclear processes and steps to follow outside of guidance provided in Companion Guide
- Unclear on what/when to report to funding agency
 - After first IRE ICDUR sent entire review package to funding agency
 - Unnecessary as research was NOT with one of experiments and did not meet definition of DURC
- Better guidance/training tools provided by regulators (ie, webinars) for IRE committee members on what is DURC, what the Policy requires, and steps to follow
- Confusion over DURC policies, Gain of Function Moratorium, and what could and could not be done







