



IRB CLOSURE GUIDELINES

DATA COLLECTION

- Data collection procedures must be complete.
 - This includes recruitment, consent/assent, data collection, and analysis of identifiable data.

CONSENT/ASSENT FORMS

- Consent/assent forms must be retained for three years following the closure of the IRB.
 - The documents are destroyed after three years.
- Consent/assent forms must be stored in a secure location and separate from the de-identified data.

DE-IDENTIFIED DATA

- Data must be de-identified.
 - Master and subset data must be removed of **ALL** identifiers.
 - All personal identifiers are permanently removed from data. No code or key exists to link the individual back to the data.
- The “Key Code” document(s) detailing identifiers and the assigned pseudonyms/participant code must be destroyed prior to closing the IRB.
 - If a link exists, data are considered indirectly identifiable and not anonymous, anonymized or de-identified.
- Subsets of identifiable data must be destroyed.

ADDITIONAL DOCUMENTS

- Any documents (excluding the consent/assent forms) with identifiers are to be destroyed prior to closing the IRB.
 - Recruiting documents
 - Emails
 - Letters
 - Social Media Forums/Messages
 - Contact Information
 - Names
 - Phone numbers
 - Emails
 - Mailing addresses

MANUSCRIPTS

- Researchers can analyze de-identified data for ongoing and future manuscript submissions.
- Data subsets provided to researchers for secondary analysis must be de-identified.