



Report to the Audit and Compliance Committee of
the UHS Board of Regents on:

UNIVERSITY OF HOUSTON
EDUCATION RESEARCH CENTER
AR2023-09

UNIVERSITYof **HOUSTON** **SYSTEM**

INTERNAL AUDITING DEPARTMENT

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EXECUTIVE SUMMARY

Overview and Scope Summary

The University of Houston Education Research Center (UH ERC) was established in 2017. An agreement between the Texas Higher Education Coordinating Board (THECB) and the University of Houston center upon the UH ERC establishing appropriate policies and procedures and data protection. An annual audit of the UH ERC is required to ensure compliance with the terms and conditions agreed to between the parties.

Observations

During the audit, Internal Auditing Department (IAD) focused on evaluating compliance with the requirements in the agreement. IAD sampled 17 projects. Of the 17 projects sampled, two projects had an IRB expiration date prior to the beginning of Fiscal Year 2022.

Overall Audit Opinion

IAD identified minor improvements to policies and procedures related to maintaining valid Institutional Review Board (IRB) approvals.

Recommendations:

IAD recommends UH ERC improve policies and procedures related to reviewing and maintaining IRB approvals and exemptions by documenting expiration dates to ensure researcher's IRB approval or exemption do not expire.

ANALYSIS OF THE UNIVERSITY OF HOUSTON EDUCATION RESEARCH CENTER MANAGEMENT ACTION BRIEFING

OBJECTIVE AND SCOPE

The objective of the audit was to ensure compliance with the requirements established in the agreement between the THECB and the UH ERC for Fiscal Year 2022.

IAD focused on the following compliance areas:

- Confidentiality/non-disclosure
- Policies and procedures
- Information technology security
- Information technology access
- Data storage
- Data transmission

Observations

During the audit, Internal Auditing Department (IAD) focused on evaluating compliance with the requirements in the agreement. IAD sampled 17 projects. Of the 17 projects sampled, two projects had an IRB expiration date prior to the beginning of Fiscal Year 2022.

During the review, IAD noted Rice University's was the only university that had an IRB exemption expiring in one year. Because of this finding, IAD expanded the testing and requested 100% of IRB approval for all Rice University projects. No additional issues were identified.

Overall Audit Opinion

IAD identified minor improvements to policies and procedures related to maintaining valid Institutional Review Board (IRB) approvals.

Recommendations:

IAD recommends UH ERC improve policies and procedures related to reviewing and maintaining IRB approvals and exemptions by documenting expiration dates to ensure researcher's IRB approval or exemption do not expire.

ISSUE 1– IRB APPROVAL

Objective: To determine the UH ERC complies with the requirement to obtain IRB approval or exemption related to human research subjects.

Criteria: Section 4.0 of the agreement requires UH ERC to abide by UH Institutional Review Board (IRB) Policies and Procedures regarding human subjects. The UH ERC shall provide evidence of approval from the IRB or justification for exclusion from the IRB process before a researcher has access to any data.

Risk: Researchers must understand and follow the guidelines established by the IRB to ensure safety of human research subjects so that research funding is not jeopardized.

Observation: UH ERC researchers must apply to their home institution IRB for approval or exemption for all research projects.

IAD obtained a listing of researchers with UH ERC projects and selected a sample of 10 researchers from the 101 researchers identified. IAD requested UH ERC to provide a copy of the current IRB project approval or exemption.

One researcher having three different UH ERC projects obtained approval from their home institution's IRB prior to before the researcher had access to any data. However, the IRB approval listed an expiration date prior to the beginning of Fiscal Year 2022. IAD considered this approval expired for Fiscal Year 2022.

Conclusion: The UH ERC allowed research projects that did not have human subjects to continue with an expired IRB exemption. The issues identified in this report reflect minor control weaknesses related to compliance with the agreement requirements.

Recommendation:

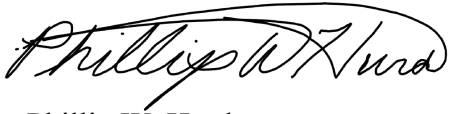
IAD recommends UH ERC improve policies and procedures related to reviewing and maintaining IRB approvals and exemptions by documenting expiration dates to ensure researcher's IRB approval or exemption do not expire.

Management's Response:

Staff have contacted the researcher with the expired IRB identified to secure an approved IRB to continue the study. Staff have reviewed the IRB documentation requirements when establishing approved projects. In addition, staff are in the process of reviewing the IRB approvals for all UH ERC projects to confirm any identified IRB end dates and identify any projects that may need to secure new IRB documentation. Expected completion date February 28, 2023.

The UHS Department of Internal Auditing would like to thank the UH Education Research Center for its cooperation and assistance during this audit process.

Sincerely,

A handwritten signature in cursive script that reads "Phillip W. Hurd". The signature is written in black ink and is positioned above the printed name.

Phillip W. Hurd
Chief Audit Executive
University of Houston System

PWH/pwh/AP Audit

Participating Auditors: Brandee O'Neal, Connie Applebach and Kim Gerry

UNIVERSITY of HOUSTON

INTERNAL AUDITING DEPARTMENT

Action Item Number	Audit Area	University	Recommendation Summary	Task	Responsible Person	Target Date	Status
1	IRB Updated Procedures	UH	IAD recommends UH ERC improve policies and procedures related to reviewing and maintaining IRB approvals and exemptions by documenting expiration dates to ensure researcher's IRB approval or exemption do not expire.	Staff are in the process of reviewing the IRB approvals for all UH ERC projects to confirm any identified IRB end dates and identify any projects that may need to secure new IRB documentation. Expected completion date February 28, 2023.	Jeanette Narvaez	2/28/2023	