

**Dear CSBBCS Member:**

**Summary:** A few weeks ago, we sent a request for comments on a document called MOVING AHEAD which outlines a system for accrediting Research Ethics Boards (REBs) in Canada. This document was drafted by a committee of experts who were tasked with drafting a new system for governing research with humans in Canada. So far our call has produced only 4 comments ... responses from less than 1% of the CSBBCS membership. The expert committee is likely to take such collective silence as a sign of agreement with the proposed accreditation system. Thus, if our concerns are not considered in the development of a new research governance system, we will have only ourselves to blame.

**What Moving Ahead is About:** The governance system proposed in Moving Ahead was motivated, in part, by the accumulated evidence that the current research governance system has serious problems. Those problems have been described, studied, discussed extensively (for years) in a number of publications at least some of which are referenced in Moving Ahead. The purpose of Moving Ahead is not to rehash the problems, but to outline a fix for them. In the US, a voluntary accreditation system was created mainly in order to avoid the other option, which is a legal framework (laws and regulations) that directs how research ought to be done.

**A few concerns about Moving Ahead:**

1. One major concern with the Moving Ahead proposal is its lack of details (the devil is in the details), and thus, our (overt or covert) agreement with this document is likely to buy us a pig in the poke.
2. The drafters of Moving Ahead are aware that the TCPS was introduced largely without input from behavioral researchers (then the NSERC and SSHRC community), and thus, it generated (and is still generating) a great deal of anger, opposition and confusion. While acknowledging this problem which occurred in connection with the TCPS and the need for avoiding the same type of problem in connection with the introduction of a new governance system, Moving Ahead provides no information about any concrete steps that will be taken to consult more widely with behavioral researchers, with folks like us. The plan outlined in Moving Ahead may serve the needs of medical researchers but will it do the same for us?
3. Moving Ahead proposes a board of 15 who will direct all activities (including setting policies for REB review of behavioral research) of the new accreditation council. Who will be those 15? There is no way that 15 is a sufficiently large group for representing all of the diverse communities of individuals and institutions who do research with human participants. Since the medical folks have been driving the enterprise so far and since they will fight for board representation, a board of 15 will not leave sufficient room for NSERC researchers, for SSHRC researchers, for human-computer interaction researchers, for sociologists who interview drug addicted street level sex trade workers, for economists who work with focus groups to develop new media advertising strategies, etc.
4. The Moving Ahead document is silent on the implementation phase. It would seem that one of the first things that would be required for the development of a truly effective accreditation system is the development of accreditation standards. Those standards ought to be developed from the ground up in order to be appropriate to the diverse REBs that exist across the country.

5. Moving Ahead proposes that accreditation of REBs will be mandatory.
6. National Council for Ethics in Human Research (NCEHR) has been conducting REB site visits for many years. In the past few years, it has also drafted a few standards – operationalizations -- of how REBs ought to function, what they ought to be doing in order to determine whether or not a research proposal complies with the TCPS, etc. During the past year, as part of its site visits, NCEHR has been testing those standards, in part in order to learn about the standard development process, etc. The experts committee is aware of the work NCEHR has been doing and yet that work and the lessons that have emerged from it are nowhere to be found in Moving Ahead.

We fear that the scheme proposed in Moving Ahead will become a monster, a massive agency with loads of bureaucrats who are out of touch with the day to day work of REB and the real life context in which we live as researchers. We fear that this agency will impose even heavier requirements for record keeping and tracking what we do in the lab, all because of a process/system that is geared toward biomedical research, the needs of health Canada and of the FDA in the US.

Please make your voice heard, and do it now. The consultation period closes on November 30 2007. Send your comments to us (as a response to this email), or send them directly (electronically) to:

The Sponsors' Table Secretariat at [secretariat@hrppc-pphrc.ca](mailto:secretariat@hrppc-pphrc.ca)