

## ORARC Tip Sheet: DUAL AFFILIATION

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### Context:

Any agent of Harvard<sup>1</sup> conducting human subjects research must have Harvard Longwood Campus (HLC) IRB review and approval (or reliance determination) in place prior to beginning their project.

### Dual Affiliation:

Investigators may have dual affiliations at both Harvard and local hospitals, or other academic institutions. In these cases, the investigator should submit their IRB application to the institution where their primary appointment is held, unless Harvard is the prime awardee of the funding. If an investigator with a dual affiliation is acting as an agent of a Harvard LMA School *and* their funding is being awarded through Harvard, they should submit their IRB application to the HLC IRB.

### Primary Affiliation:

Typically your primary affiliation is at the institution where you get your paycheck and/or the institution where you are primarily on-duty in any capacity (e.g. as an employee or student).

### Case Examples:

- **Case 1:** A researcher holds an appointment as Professor of Medicine at Harvard Medical School (HMS) and as an internist at Mass. General Hospital (MGH). Their primary appointment is at HMS and they conduct all of their research in their HMS capacity, rather than their MGH capacity. This researcher should submit their IRB application to the HLC IRB.
  - **Case 1a:** Same scenario however, the researcher conducts their research in *both* their HMS & MGH capacities. The researcher should submit their IRB application to the HMS IRB, as that is where their primary appointment is held. That said, the researcher should also consult with the MGH IRB to confirm what IRB oversight is needed at MGH.
- **Case 2:** A researcher holds an appointment as Psychiatrist at McLean Hospital and as an adjunct Professor of Psychiatry at HMS. The researcher's primary appointment is at McLean but they receive an NIH grant that is awarded through HMS. The researcher should submit their IRB application to the HLC IRB because HMS is the prime awardee on the funding. That said, the researcher should also consult with the McLean IRB to see what IRB oversight is needed there.
- **Case 3:** An HMS student is mentored by a cardiologist at MGH and will conduct their research within the Cardiology Department at MGH. The HMS student is conducting their research as a Harvard student and, therefore, they should submit their IRB application to the HLC IRB.
- **Case 4:** A researcher is a physician at Brigham & Women's Hospital (BWH) and is also enrolled as a student in a graduate program at HMS. The researcher must complete a research project for her thesis and will conduct this project at BWH as part of her capacity as physician there. This researcher should first consult with the BWH IRB, as her primary appointment is held there. If the BWH IRB believes they are not engaged in the research, the researcher should submit their IRB application to the HLC IRB. In this case, the BWH IRB must be consulted first as the primary appointment holder.
- **Case 5:** A researcher, whose primary appointment is at the Harvard T.H. Chan School of Public Health is part of a collaboration with investigators at the University of the Witwatersrand in South Africa. The researcher's primary appointment is at Harvard and thus, their research requires Harvard IRB oversight. In addition, they will also need to secure local IRB approval from the University of the Witwatersrand's ethics committee.

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<sup>1</sup> See "ORARC Tip Sheet – Agent of Harvard" for more information.



## Additional ORARC Toolkit Materials:

- [Human Research Protection Plan](#)