

Policy 100: IBC Meeting Minutes and Public Access

I. PURPOSE

To describe the policy for the preparation, redaction, and public accessibility of Dartmouth College Institutional Biosafety Committee (IBC) meeting minutes and public attendance at IBC meetings in accordance with the NIH Guidelines for Research Involving Recombinant and Synthetic Nucleic Acids (*NIH Guidelines*).

II. REGULATORY BACKGROUND

The *NIH Guidelines* require that IBC minutes and documents related to the review and conduct of research involving recombinant or synthetic nucleic acids (r/sNA) be made available to the public upon request (Section IV-B-2-a-(7)). Furthermore, the *NIH Guidelines* state that attendance at IBC meetings should be open to the public when consistent with the protection of privacy and proprietary interests (Section IV-B-2-a-(6)).

III. RESPONSIBILITIES

A. Biological Safety Officer (BSO)

- i. Prepares IBC meeting minutes
- ii. Submits IBC meeting minutes for IBC approval
- iii. Receives public request for meeting minutes
- iv. Sends requests to General Counsel
- v. Processes, redacts, and sends copies of IBC approved minutes to requestor
- vi. Schedules IBC meetings
- vii. Will communicate IBC meeting location and time upon request

B. IBC Chair

- i. Forwards any requests for IBC meeting minutes to BSO
- ii. May assist BSO with redaction of minutes

C. General Counsel

- i. Informs BSO as to when the minutes may be released to requestor
- ii. May assist BSO with redaction of minutes
- iii. May assist BSO with decisions regarding public attendance at IBC meetings to protect privacy and proprietary interests



IV. PROCEDURES

A. Preparation of Meeting Minutes

The *NIH Guidelines* do not specify a required level of detail for IBC meeting minutes; however, they should reflect IBC oversight as outlined in Section IV-B-2-b. The Dartmouth IBC meeting minutes will reflect all major topics of the agenda, including announcements, old business, new business, BSO report, policies, informational or training materials relevant to the IBC, and incidents.

Minimally, the following information will also be recorded in the minutes:

- i. Date and place of the meeting
- ii. Time of meeting commencement
- iii. Approval of the prior meeting's minutes
- iv. IBC member roster
- v. Members present, excused, absent
- vi. Motions approved
- vii. Summaries of research reviewed, including Principal Investigator (PI) name, project title(s), applicable section(s) of the *NIH Guidelines*, approved biosafety level, and any stipulations of approval
- viii. Time of meeting adjournment

Copies of approved meeting minutes will be retained in the Office of Environmental Health & Safety for five years after which they may be securely destroyed.

B. Redaction of Meeting Minutes

The Dartmouth IBC is responsible for oversight of all research involving biohazardous materials, including r/sNA. Since the *NIH Guidelines* apply only to research involving r/sNA, the projects and activities that do not involve the use of these materials are not subject to the public access requirements. Therefore, all information related to activities not involving r/sNA will be redacted from the meeting minutes.

- i. Information redacted include, but are not limited to, the above and:
 - Trade secret information
 - Other proprietary or confidential commercial information
 - Home telephone numbers or addresses of IBC members
 - Locations of laboratories, animal facilities, and offices
 - Locations of biohazardous materials
 - Personal information about the Principal Investigator (PI)
 - Specific dates regarding animal experimentation
 - Proprietary information received from sponsors of clinical gene transfer studies
 - Proprietary information received from PIs with patents pending
 - Other specific information that would directly compromise institutional or national security
- ii. Information not redacted, include the above (Policy Section IV-A) and:
 - Names of guests present at meetings
 - Statements of recusal from discussion or voting due to a conflict of interest
 - Basic information related to the risk assessment and containment levels required by the *NIH Guidelines* for the proposed research



C. Public Access of Meeting Minutes

In accordance with the *NIH Guidelines*, Dartmouth College shall make available to the public all IBC meeting minutes and any documents submitted to or received from funding agencies that the latter are required to make available to the public (Section IV-B-2-a-(7)). Any public requests for IBC meeting minutes should be submitted in writing to the Dartmouth College Biological Safety Officer in the Office of Environmental Health & Safety. IBC meeting minutes requests will be reviewed by the BSO, IBC Chair, EHS Director, General Counsel, and the Responsible Official (Vice Provost for Research) and will be redacted if necessary, as described above.

Meeting minutes will be provided as a hardcopy via U.S. mail. An institutional charge for the cost of preparing the minutes may be requested. Meeting minutes may only be made publicly available after they have been ratified by the IBC.

D. Provision of Public Comments to the NIH Office of Biotechnology Activities

In accordance with the *NIH Guidelines*, the Dartmouth IBC shall allow for public review of its actions through the provision of meeting minutes to those that have requested such documentation. The IBC, in consultation with the Biological Safety Officer, EHS Director, and General Counsel, shall review and respond to all written public comments received in response to public review of meeting minutes in a manner that is consistent with any redaction policy noted in these policies and procedures. Dartmouth shall forward both the public comments and the IBC response in a timely manner to the Office of Science Policy, National Institutes of Health, preferably by e-mail to: NIHGuidelines@od.nih.gov; or mailed to the below address:

Program on Biosecurity and Biosafety Policy
Office of the Director
National Institutes of Health
6705 Rockledge Drive
Suite 750, MSC 7985
Bethesda, MD 20892-7985

E. Public Attendance at IBC Meetings

Any member of the general public who wishes to attend an IBC meeting is welcome to do so for the portion of the meeting that involves discussion of research with r/sNA. Any individual interested in attending an IBC meeting should contact the BSO for the meeting time and place, as indicated on the IBC website. The College reserves the right to restrict access to any other portion of the meeting and discussion.

V. RESOURCES

- *NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules (NIH Guidelines)*. National Institutes of Health Office of Science Policy, 84 FR 17858, 2019 April <https://osp.od.nih.gov/biotechnology/nih-guidelines/>