**Guidance: Study Closure**

**Involvement of Human Subjects**
A research project involving human subjects must receive continuing review at least annually as long as the project continues to involve human subjects. A project continues to involve human subjects as long as the researcher continues to obtain:

- Data about the subjects of the research through intervention or interaction with them
- Identifiable private information about the subjects of the research, to include:
  - Collecting or receiving identifiable private information
- Identifiable biological specimens originating from living individuals, to include:
  - Collecting or receiving identifiable biological specimens
- Identifiable private information by observing or recording private behavior without interacting or intervening with the human subjects; and
- Using, studying, or analyzing identifiable private information and/or identifiable biological specimens, even if the information was already in the possession of the investigator before the research began. This includes using, studying, or analyzing any of the following:
  - Identifiable private information obtained by interacting or intervening with the human subjects;
  - Identifiable private information stored in documents, records, photographs, images, video recordings, or audio recordings provided to the investigators from any source;
  - Identifiable private information stored in documents, records, photographs, images, video recordings, or audio recordings already in the possession of the investigator before the research began;
  - Identifiable private information obtained about an individual by interviewing other people (e.g., an individual’s healthcare provider or teacher);
  - Identifiable biological specimens provided to the investigators from any source; or
  - Identifiable biological specimens already in the possession of the investigator before the research began.

**End of Human Subject Involvement**
A research project no longer involves human subjects, and therefore may be closed out with the CUNY HRPP Office, when:

- The investigators have finished obtaining data through interaction or intervention with subjects or obtaining identifiable private information about the subjects; **AND**
• The investigators have finished using, studying, or analyzing identifiable private information.

Example:
• When the only remaining activity of a research project involves the analysis of aggregate data sets without individual subject identifiers, no further continuing review is necessary.

**Study Closure Process**
When an investigator has completed a research project involving human subjects or when human subjects are no longer involved in a research project, the investigator must submit the CUNY Submission Form – Final Report in IRB Net. Upon review of the closure form, the investigator will receive either an acknowledgment of study closure or a request for additional information from the HRPP Office.