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From: Hilary Bergsieker

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To: secretariat (SRCR/SCRR)

Subject: TCPS 2 CONSULTATION

Sensitivity: Normal

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Dear Panel on Research Ethics and the Secretariat on Responsible Conduct of Research,

I would like to voice my **strong support for the proposed framework for review of multi-jurisdictional research**, based on my experiences as a researcher at the University of Waterloo who is pursuing multi-site projects with other Canadian Universities (UBC, Simon Fraser, UofT, McMaster, Guelph, etc.). Not only would the proposed changes translate into substantial savings in time for researchers (and already overstretched university Ethics review staff, like those at UW), and less complexity for participants reading materials with boilerplate ethics language from multiple institutions, but **these changes would also help avoid hurdles arising from minor differences in institutions' in-house interpretations of TCPS2**, which occasionally are contradictory. For example, Waterloo requires a notice of ethics clearance on all recruitment materials, whereas UBC prohibits / strongly discourages such statements as potentially coercive. For almost every single protocol involving our two institutions we've had to address these differing interpretations, resulting in delays, although eventually mutually approved wording was reached every time. Having a single REB of record would avoid consuming REB and researcher time over minor local differences in TCPS2 interpretation.

Province: Ontario

Affiliation: University

Capacity: Researcher*

Discipline: Behavioural Sciences

I am also the current chair of the University of Waterloo Human Research Ethics Board, but these comments are my own, not made on behalf of the board (see separate detailed submission from our Boards).

Cheers,

Hilary

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