

## Guidance for AAHRPP Organizations that Comply with the Common Rule

After a long process, final revisions have been published to the Common Rule. However, as you may be aware, new regulations promulgated near the end of a Presidential term are subject to a streamlined repeal process that involves Congress and the new President, and which, under current law, can be undertaken through the first several months of a new Presidential Administration. The revised Common Rule is no exception. Therefore, unless definitive action is taken sooner, uncertainty as to the ultimate fate of the new rule may well continue until late May or June 2017.

With that backdrop, the purpose of this message is to explain what to expect from AAHRPP. Please rest assured that, as with all our activities, we will endeavor to work closely with our accredited and not-yet-accredited organizations to facilitate smooth and reasonable processes related to AAHRPP accreditation. We will provide additional information as we learn more.

**AAHRPP standards are broad, and the vast majority of Standards and Elements are not affected by the revised regulations.** That said, if the new rule stands, we recognize that in the areas that may need to be updated, it will take time to revise policies, forms, and electronic systems, conduct education, and transition to the revised Common Rule. We will track federal regulatory and guidance activities closely and develop further AAHRPP guidance (including but not limited to a revised Evaluation Instrument) in a transparent, timely process designed to give our organizations ample time to understand and integrate the new requirements.

### For organizations that comply with the Common Rule:

- **Organizations whose complete process occurs prior to January 19, 2018:**  
**Organizations whose entire accreditation process will occur and be completed (including Council determination) prior to January 19, 2018 will be evaluated using the current Evaluation Instrument (October 2016).** AAHRPP will provide additional information in our newsletter and on our website.
- **Organizations whose Step 1 application is submitted prior to January 19, 2018 but whose site visit occurs on or after January 19, 2018:**  
**The Step 1 application will be evaluated using the current Evaluation Instrument (October 2016). The site visit agenda will be developed to ascertain from the organization how it is planning to address new regulatory requirements.** Policies, forms, and other materials designed to comply with the revised Common Rule may optionally be submitted as part of your application, and AAHRPP will provide comments.

- **Organizations whose entire accreditation/reaccreditation process occurs after January 19, 2018:**  
**The entire process will be conducted in accordance with the new regulations and AAHRPP’s to-be-revised Evaluation Instrument.** Applications will be reviewed to ensure policies and procedures meet requirements in the revised regulations. The Step 1 Review report provided by AAHRPP will specify any additions or changes that need to be made to policies to comply with the revised regulations. The revised regulations will be in force at the time of the site visit, and site visitors will evaluate compliance with the revised regulations.
- **Existing accredited organizations that do not have an application due should describe plans for implementing the revised regulations at the time of your Annual Report starting in December of 2017.**

<b>Applicant</b>	<b>Evaluation Instrument version</b>	<b>Site Visit</b>
Process completed in 2017	October 2016	Will not evaluate compliance with revised Common Rule, unless requested
Applicants whose activities will bridge 2017 and 2018	October 2016	Will not evaluate compliance with revised Common Rule in Step 1, unless requested; will discuss compliance with new rule during 2018 site visit
Applicants whose entire process occurs in 2018	Fall 2017 (planned)	Will evaluate compliance with revised Common Rule

Please feel free to contact AAHRPP’s Director of Accreditation, Dr. Robert Hood (at 202-783-1112 or [rhood@aahrpp.org](mailto:rhood@aahrpp.org)) with any questions you may have regarding implementation of this AAHRPP guidance.