Responsibilities of the NIH IRB vs. the RCRC Regarding Review of Research Related Events

NIH IRB:

- Reviews Reportable Event Forms (REFs) referred by the REFeree[1] group (REFerees) to determine if the event constitutes an unanticipated problem (UP) or if the event is new information that might affect the willingness of a subject to enroll or remain in the study.[2]
- As needed, review proposed protocol and/or consent form changes that result from events determined to be UPs or new information that might affect the willingness of a subject to enroll or remain in the study.
- If warranted, the IRB can suspend or terminate approval of human subjects research (HSR) in order to protect subject safety. They can also suspend new enrollment on the study.

Research Compliance Review Committee (RCRC):

- Reviews events that constitute possible serious and/or continuing noncompliance (NC) referred by the REFerees as related to HSR for which the NIH IRB is the Reviewing IRB (whether the protocol is currently open or closed) or for HSR conducted by NIH Investigators without IRB approval.[2]
- Just like the NIH IRB, the NIH RCRC is a duly convened IRB that adheres to the membership and committee requirements described in NIH Policy 3014-201-*IRB Membership and Composition*.
- The RCRC has the final authority to determine whether events constitute serious and/or continuing NC and to determine corrective action. The RCRC may also suspend or terminate IRB approval of research or suspend new enrollment on the study.

Activities	NIH IRB	RCRC
Member Composition [3]	• Nine Primary members with many Alternates • Specific members attending meetings varies	• Fixed membership of nine Primary members and four Alternate members
Meetings	Tuesday through Thursday	2nd Wednesday/month as needed[4]
Event Forms Reviewed	• Potential Unanticipated Problems. For example: ➢ Unexpected increase in frequency of secondary malignancy ➢ Unexpected, generalized tonic-clonic seizures during study procedure ➢ Calf hematoma after biopsy → fasciotomy to remove hematoma and relieve elevated compartment pressure (unexpected severity) • New Information that might affect the willingness of a subject to enroll or remain in the study	• Potential serious and/or continuing noncompliance. For example: ➢ Failure to follow the IRB approved protocol resulting in harm or otherwise materially compromising rights, welfare and/or safety of the subject ➢ Lack of PI oversight during the trial ➢ Study procedures done without consent that materially compromises subject's rights

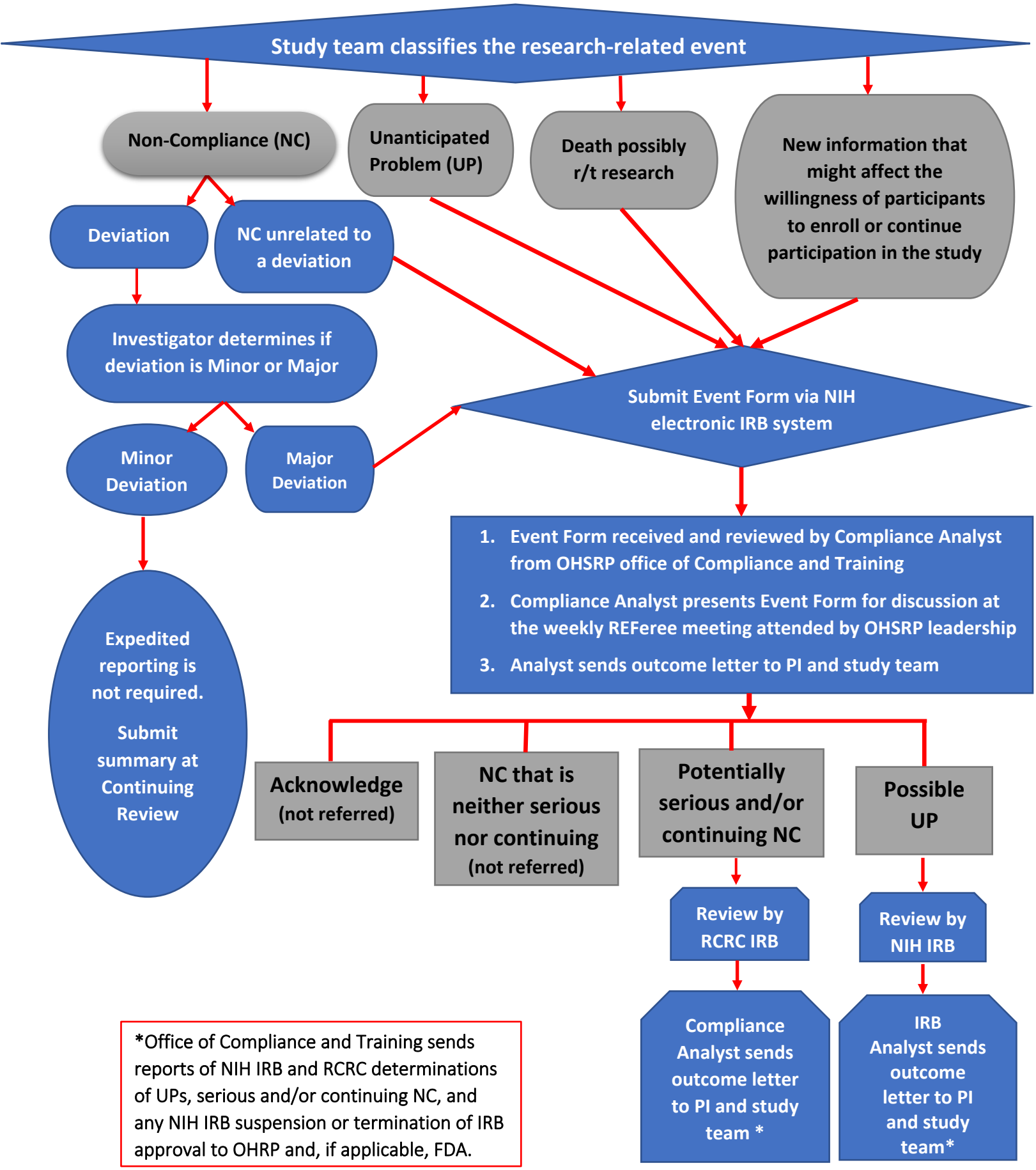
[1] The REFeree group ("REFerees") includes the Directors of OHSRP and the IRB, the IRB Executive Chair, and the Deputy Director of the IRB. This group meets weekly to review submitted REFs to determine if the reported events require referral to the NIH IRB or the RCRC for further review.

[2] See NIH IRP HRPP Policy Glossary for definition of Unanticipated Problem and for Noncompliance that is serious or continuing.

[3] Both NIH IRBs (NIH IRB and RCRC) comply with 45.CFR.46.107 and 21.CFR.56.107 (IRB membership).

[4] RCRC meetings are only held on an as-needed basis when events are referred to the Committee and do not necessarily occur monthly.

Research-Related Events: Submission, Triage and IRB Review



*Office of Compliance and Training sends reports of NIH IRB and RCRC determinations of UPs, serious and/or continuing NC, and any NIH IRB suspension or termination of IRB approval to OHRP and, if applicable, FDA.