What You Need to Know About Single IRB Review: Principles and Practice (Part 2)

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Learning Objectives

- Provide an overview of the process of utilizing the Single Institutional Review Board (sIRB) model when NIH is engaged in multi-site human subjects research (HSR)
- Provide an overview of the process when NIH serves as the sIRB and the Lead Study Team
- Provide an overview of the process when NIH is relying on an external IRB to provide sIRB review

OVERVIEW: NIH sIRB Process

- **Who is involved in the sIRB Review Process?**
  - Engaged in non-exempt human subjects research in the U.S.
  - Involved in a multi-site research protocol
  - Serving as Lead Study Team **or** Participating Site Study Team

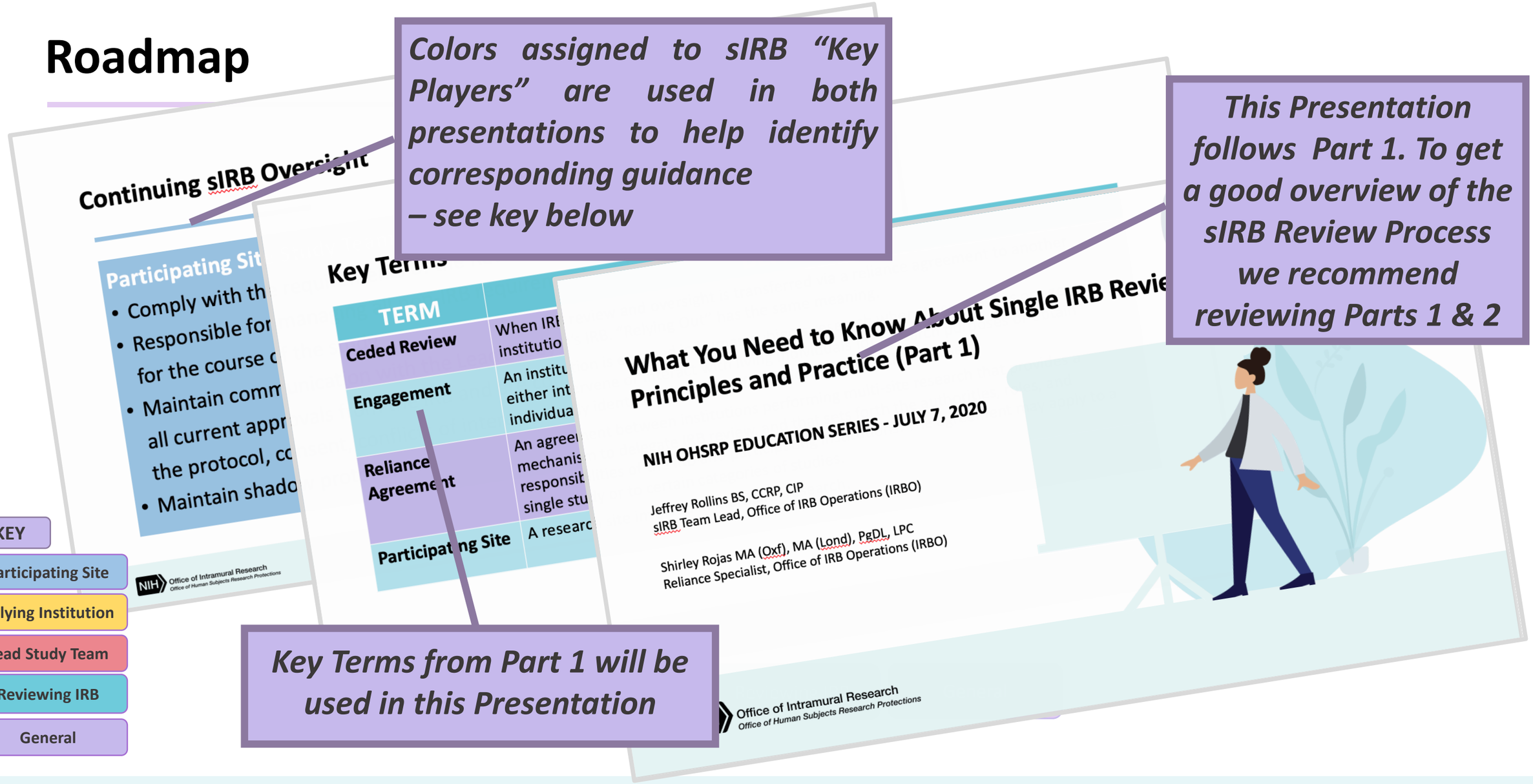
- **What is involved in the sIRB Review Process?**
  - Submitting to NIH IRB (serving as an sIRB) **or**
  - Submitting to an external Reviewing IRB, e.g. WIRB; Advarra; NCI CIRB; NMDP IRB
    - *Submission to an external IRB can occur if NIH investigators serve as the Lead Study Team or Participating Site Study Team*

- **Exceptions?**
  - Not applicable to:
    - Exempt Research
    - Non-U.S. sites

Roadmap

Colors assigned to sIRB "Key Players" are used in both presentations to help identify corresponding guidance – see key below

This Presentation follows Part 1. To get a good overview of the sIRB Review Process we recommend reviewing Parts 1 & 2

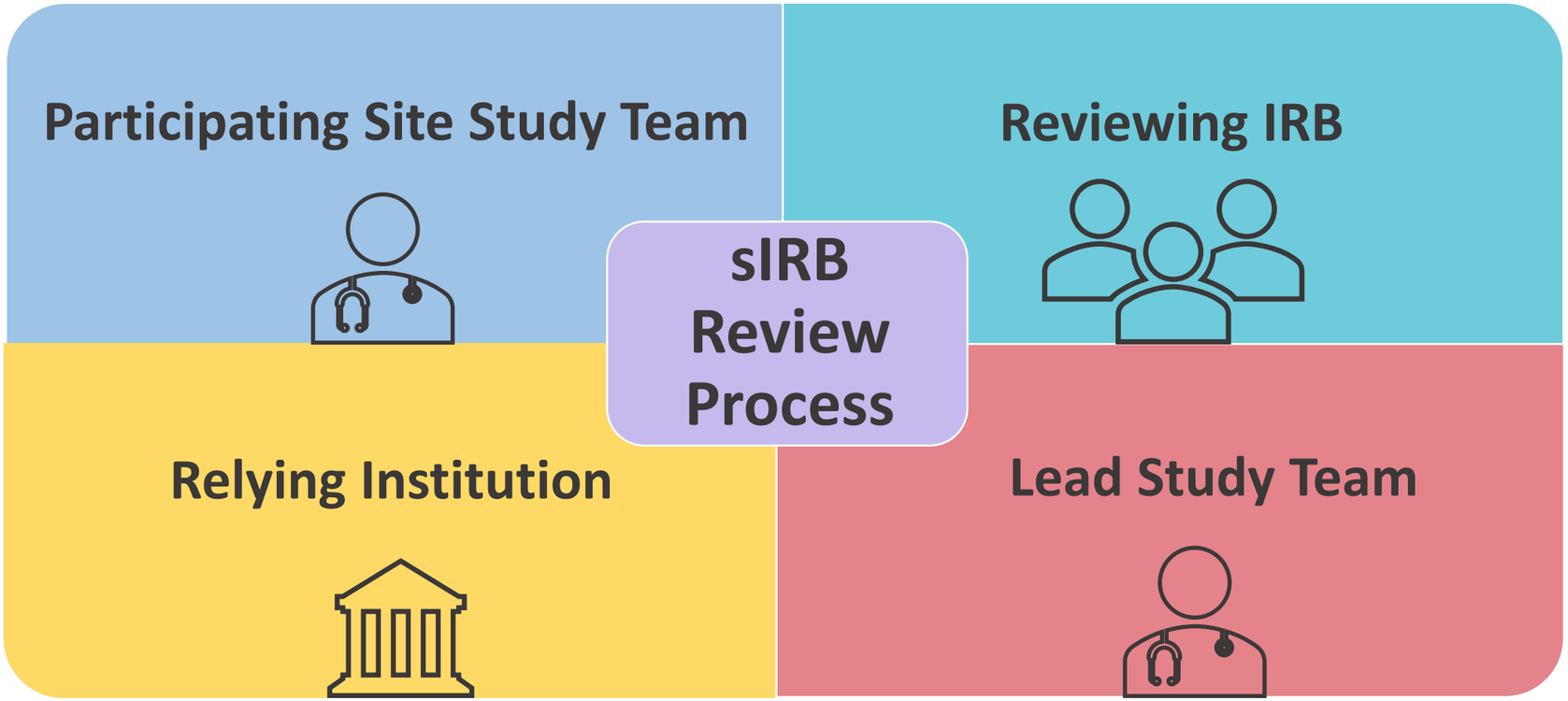


Key Terms from Part 1 will be used in this Presentation

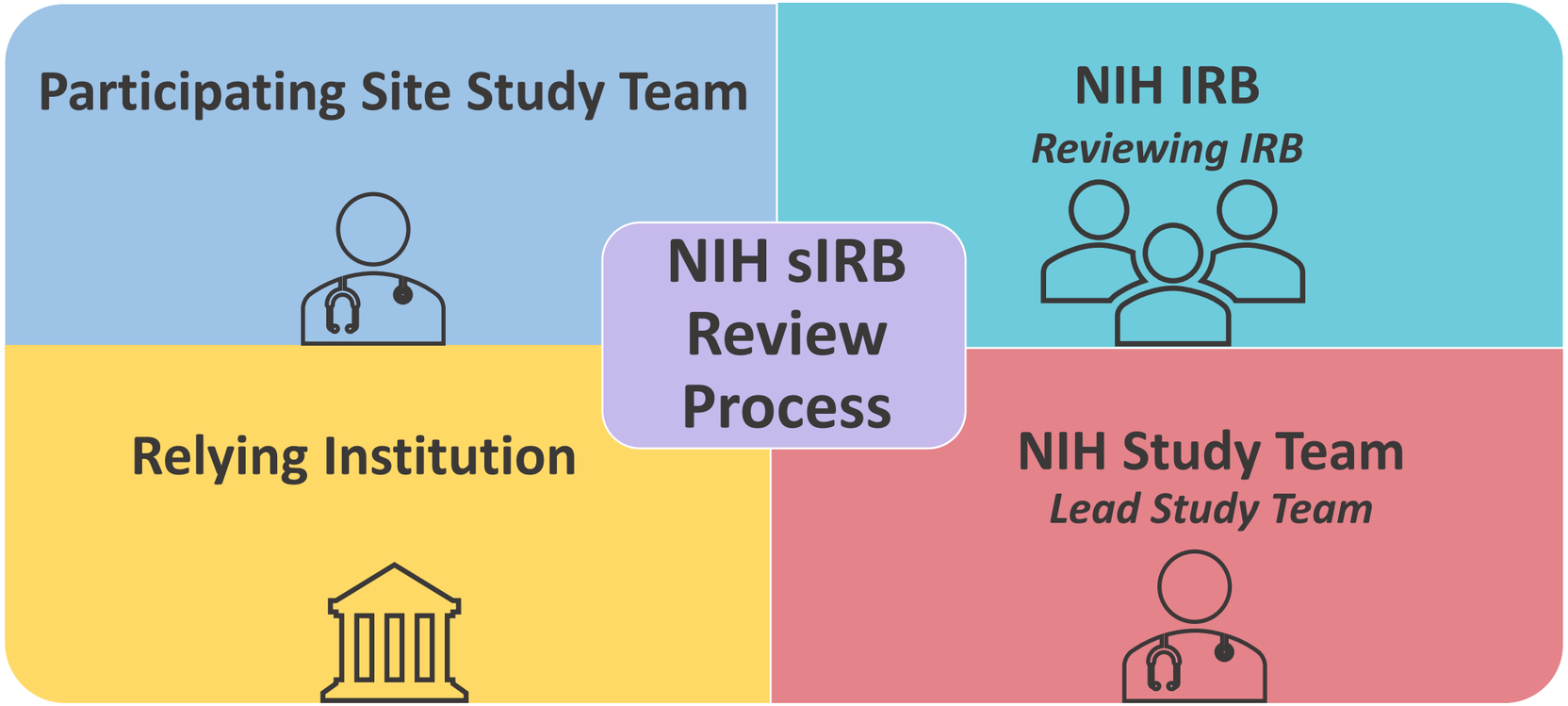
KEY

- Participating Site
- Relying Institution
- Lead Study Team
- Reviewing IRB
- General

The Key Players - General sIRB Review Process



The Key Players - NIH - Lead Site Study Team & Reviewing IRB



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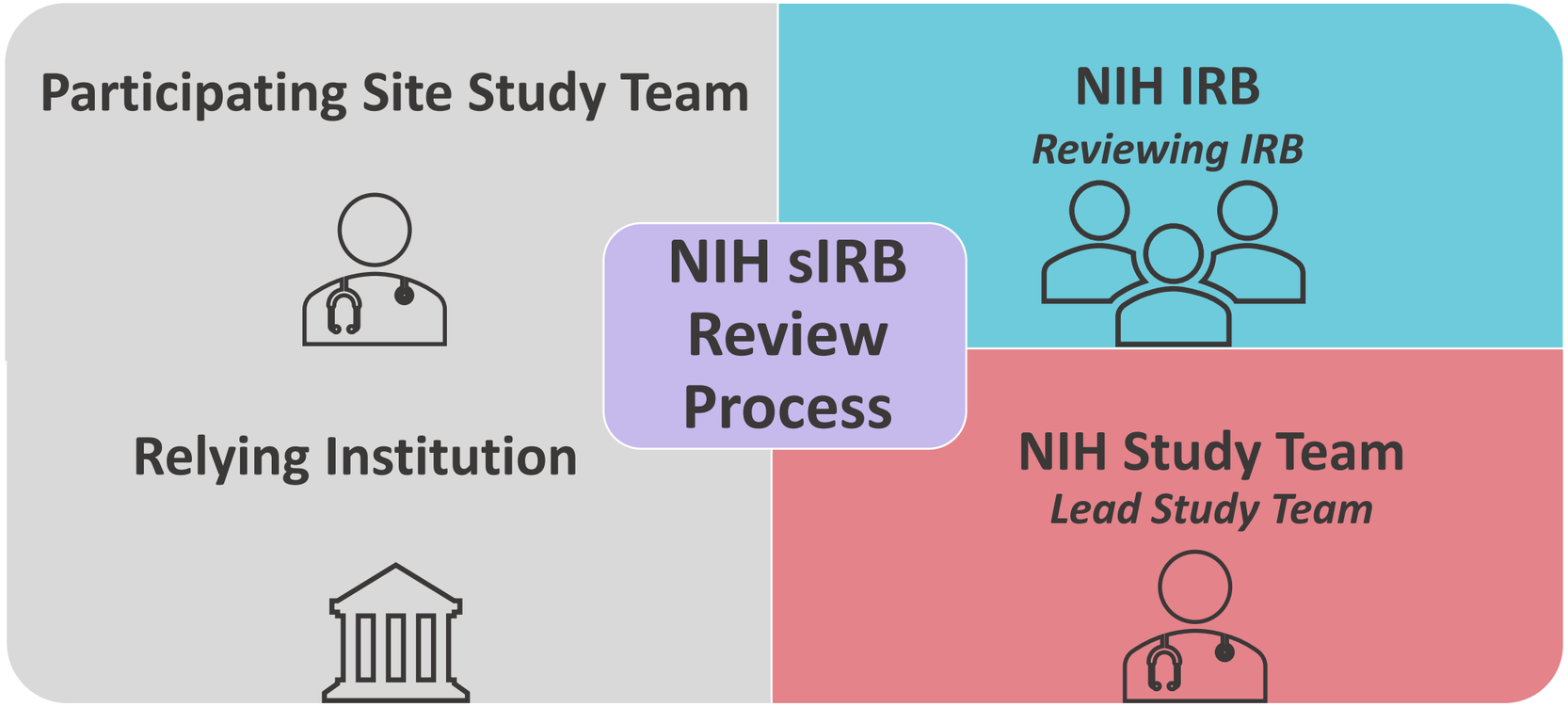
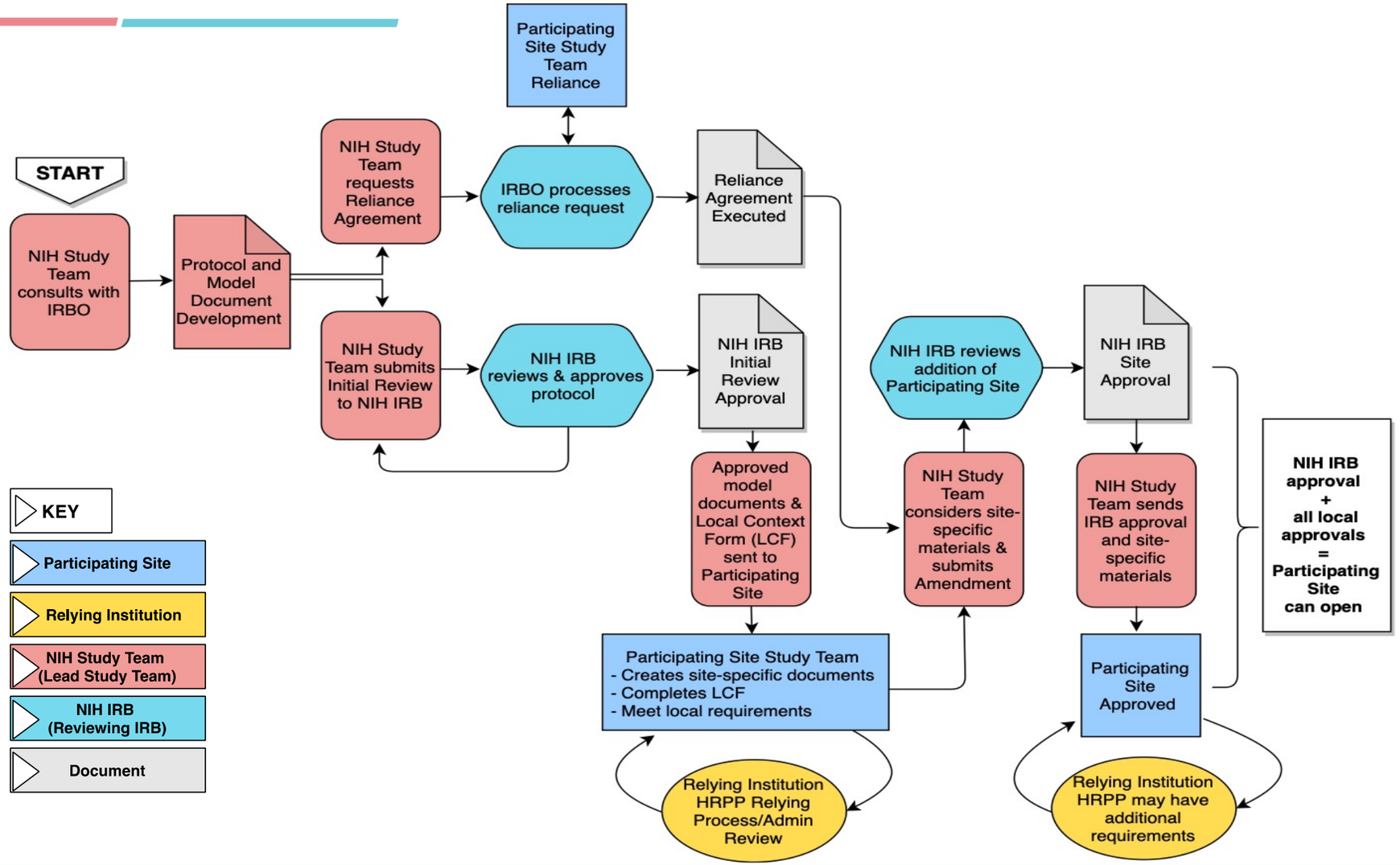
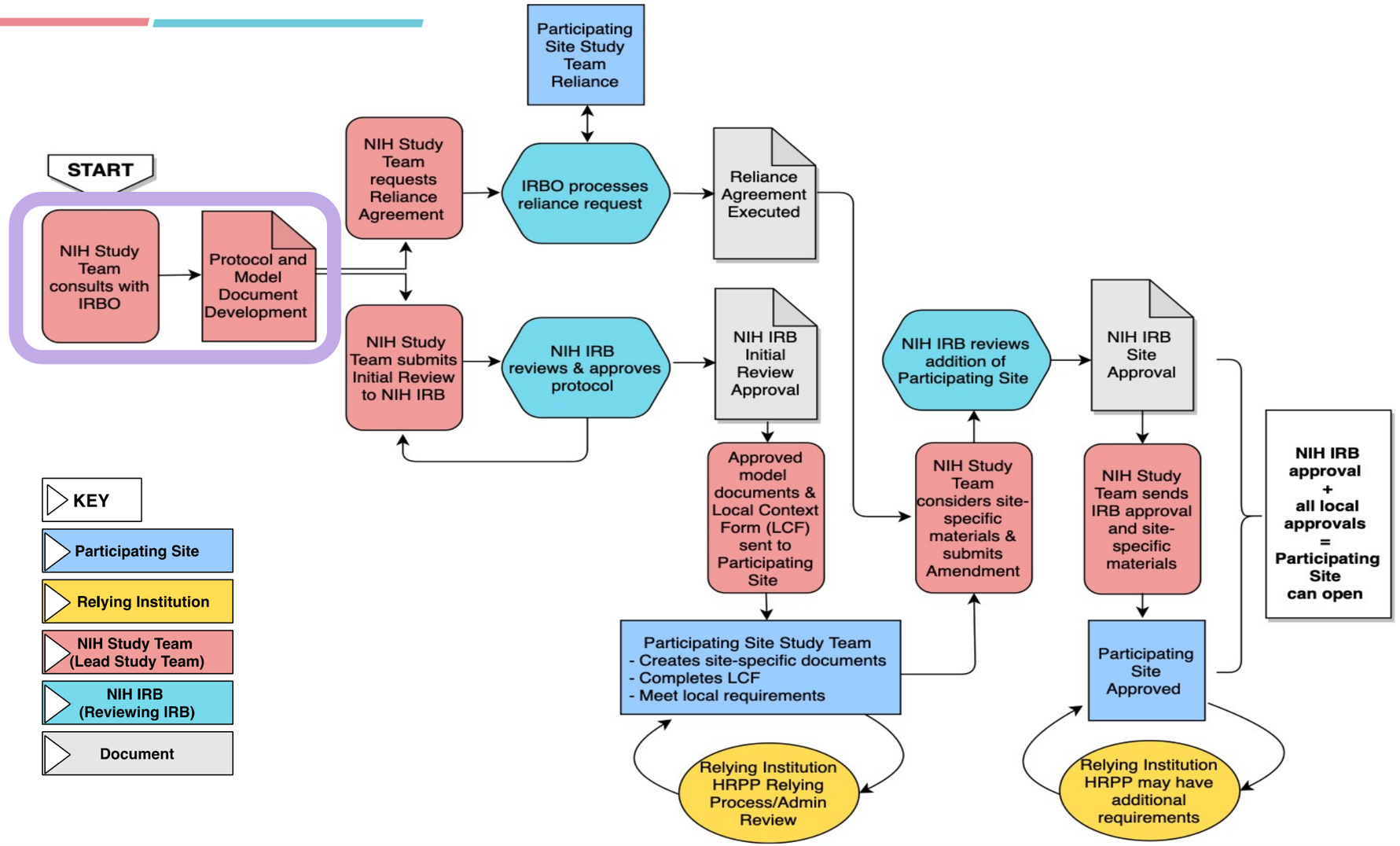


OVERVIEW: NIH - Lead Site Study Team & Reviewing IRB



OVERVIEW: NIH – Lead Site Study Team & Reviewing IRB



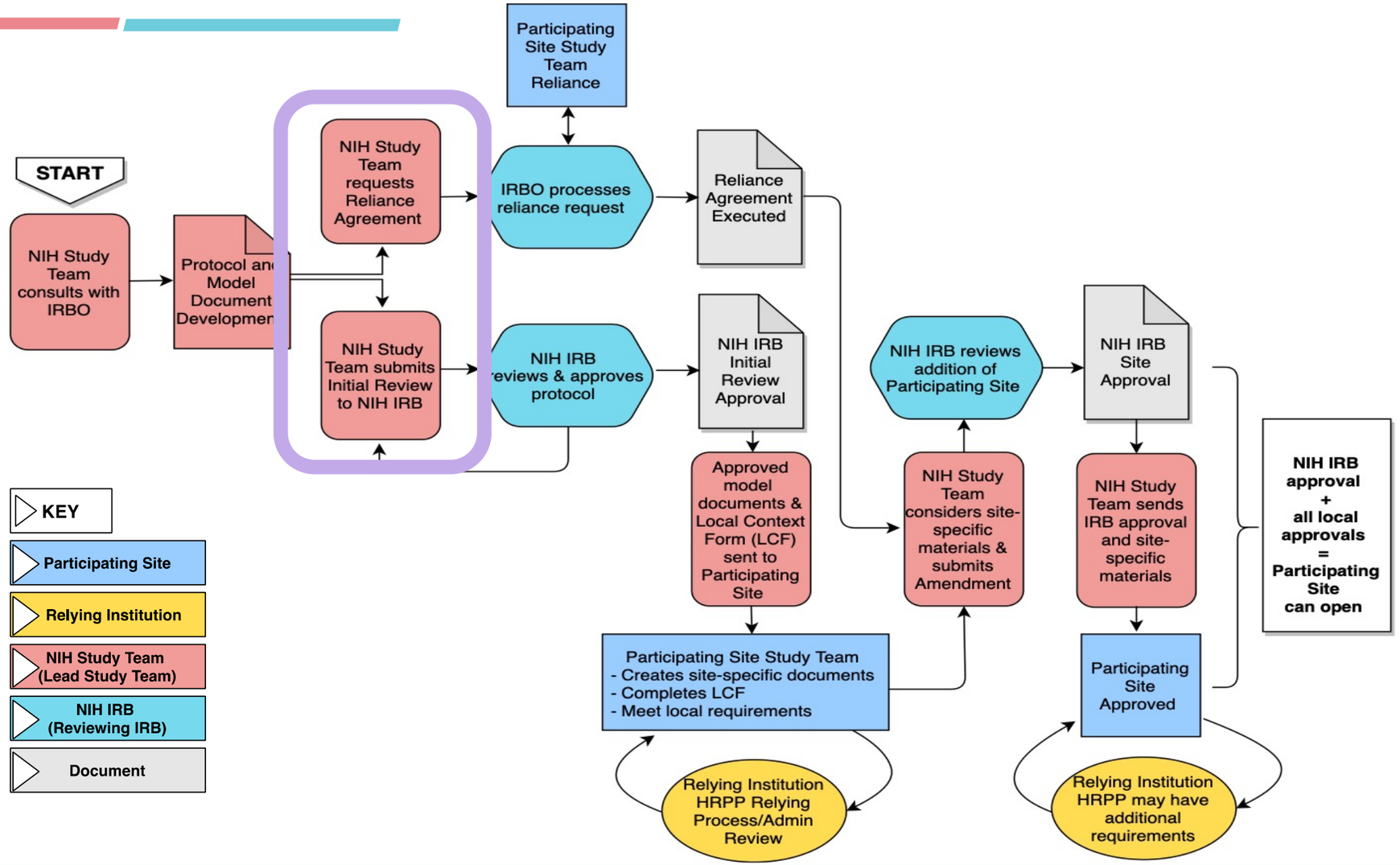
IRBO Consult: NIH - Lead Site Study Team & Reviewing IRB

	NIH as Reviewing IRB and Study Team
Consultation Request	• Consultation (as needed) via meeting or email
Reliance Agreement	• Establish Participating Site is engaged in HSR and needs IRB oversight • Reliance Agreement Request • Selection of the IRB
IRB Selection	• Establish if sIRB mandates apply • Determine if NIH IRB is appropriate to serve as the sIRB
Study Planning	• Multi-site protocol will involve more than 3 sites (including NIH as a site) • Resources considerations (staffing; coordinating center) • Investigator on grant application with extramural counterparts requiring sIRB plan • Sponsor of the study designates one institution as the sIRB • Tools and Templates • Communication plan

Lead Site: Protocol & Model Document Development

- Create main protocol
  - Should apply study-wide and not focus solely on the NIH site
  - References to other sites should be generic and allow potential differences to be noted when Participating Sites are added
- Create model consents/ assents, model recruitment materials
- Create NIH site-specific consent, recruitment materials
- Work with relying sites to consider any issues that may hinder conducting the protocol
  - NIH Study Team should critically consider local context issues
  - Will sites be able to comply with NIH IRB policies?
- Lead Study Team acts in many ways as a coordinating center

OVERVIEW: NIH - Lead Site Study Team & Reviewing IRB



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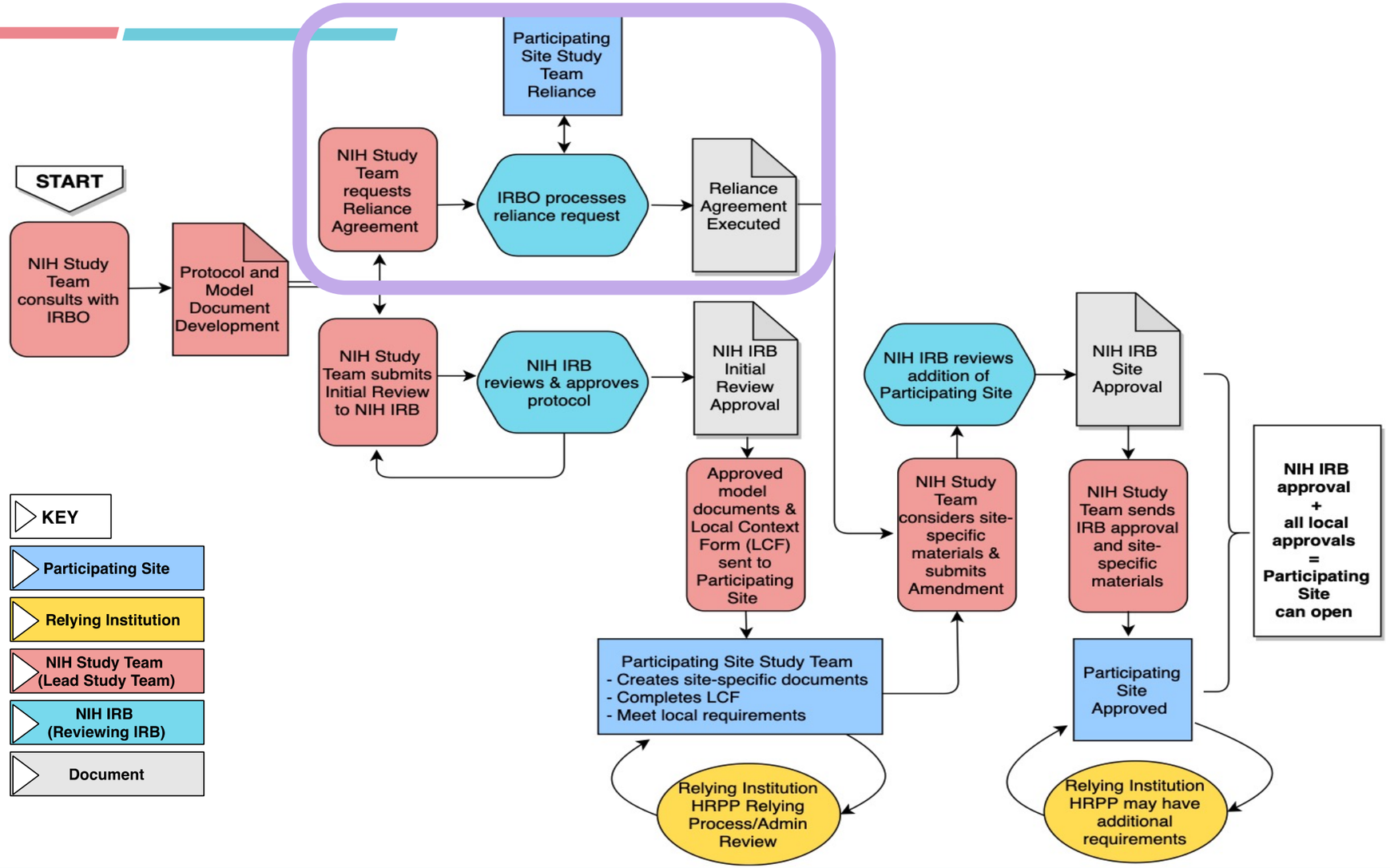


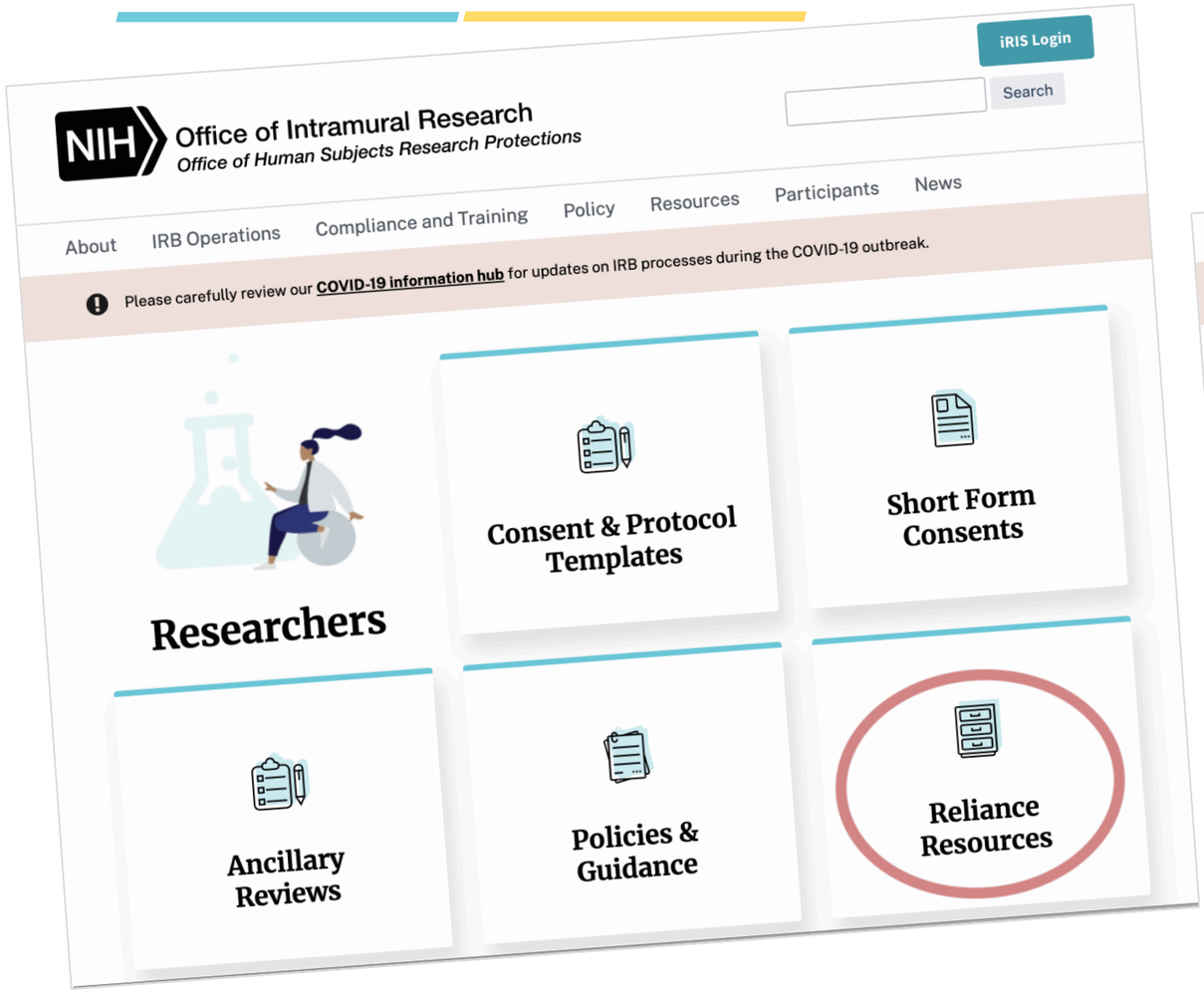
Reliance Agreement

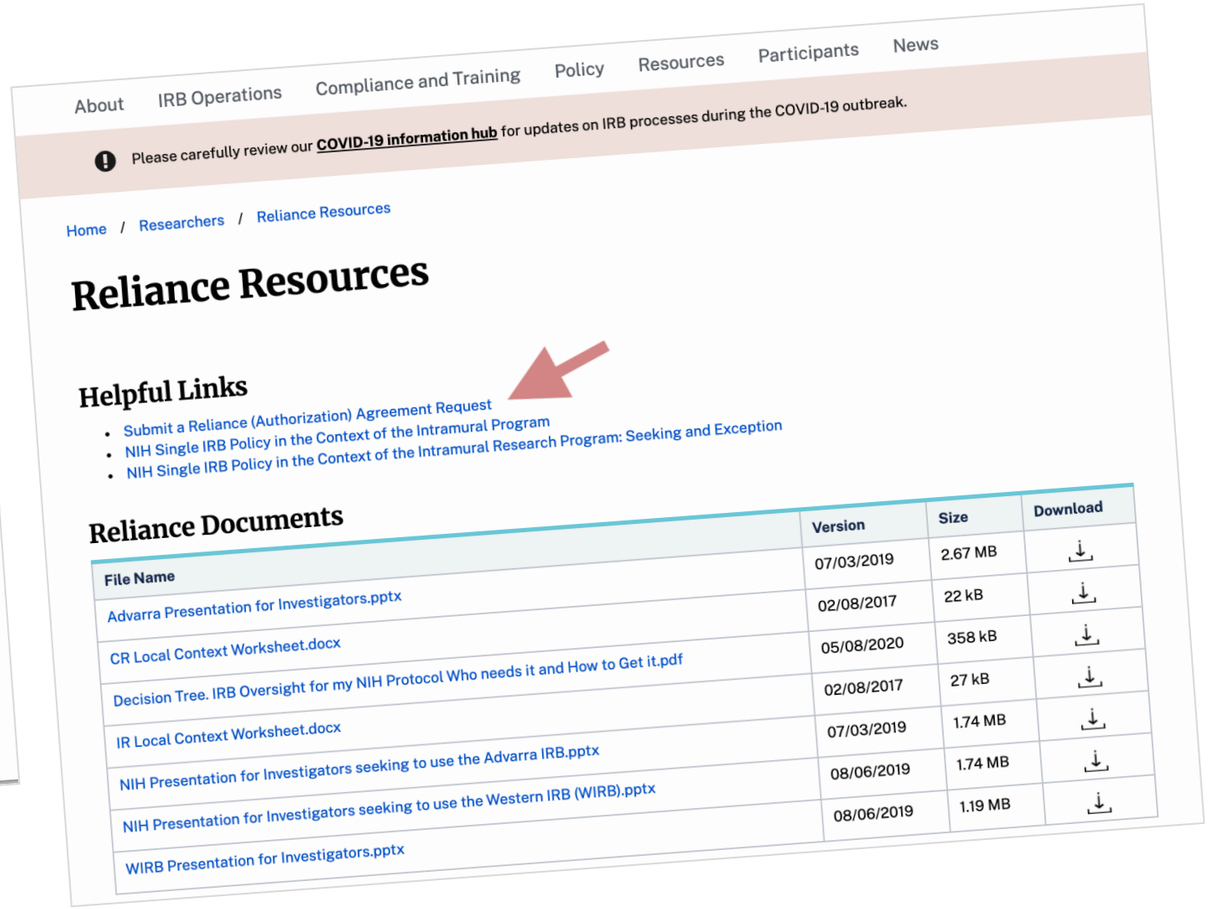
- Written agreement between institutions performing multi-site research that identifies which institution will serve as the Reviewing IRB and which will cede IRB review i.e., Relying Institution
- Outlines the roles and responsibilities of the Reviewing IRB and Relying Institution
- Negotiated by the respective Human Research Protections Program (HRPP)
- Executed by the respective Institutional Official or designee
- May apply to a single study or apply to a broader arrangement
    - Certain categories of studies e.g. NCI CIRB;
    - Studies involving frequent research partners;
    - Programmatic agreements allowing review by an sIRB of all submitted studies and the relying institution decides which to submit e.g., Advarra, Western IRB (WIRB)
- NIH can serve as the Reviewing IRB, or NIH can rely on external Reviewing IRB

Initiating a Reliance Agreement Request

- NIH PI/ Lead Investigator/ designee must:
    1. Complete a **Reliance Agreement Application** located on the IRBO website under "*Reliance Resources*"; and
    2. Submit **Supporting Document** describing the *proposed research activities* of the Relying Institution to the IRBO mailbox, irb@od.nih.gov
- When **NIH is the Reviewing IRB**, we want the supporting document to describe the *proposed research activities of the external Participating Site* as it will be the Relying Institution
- When the NIH Study Team is going to be **relying on an external Reviewing IRB**, we need the supporting document to *describe the proposed role of the NIH study team*

Initiating a Reliance Agreement Request





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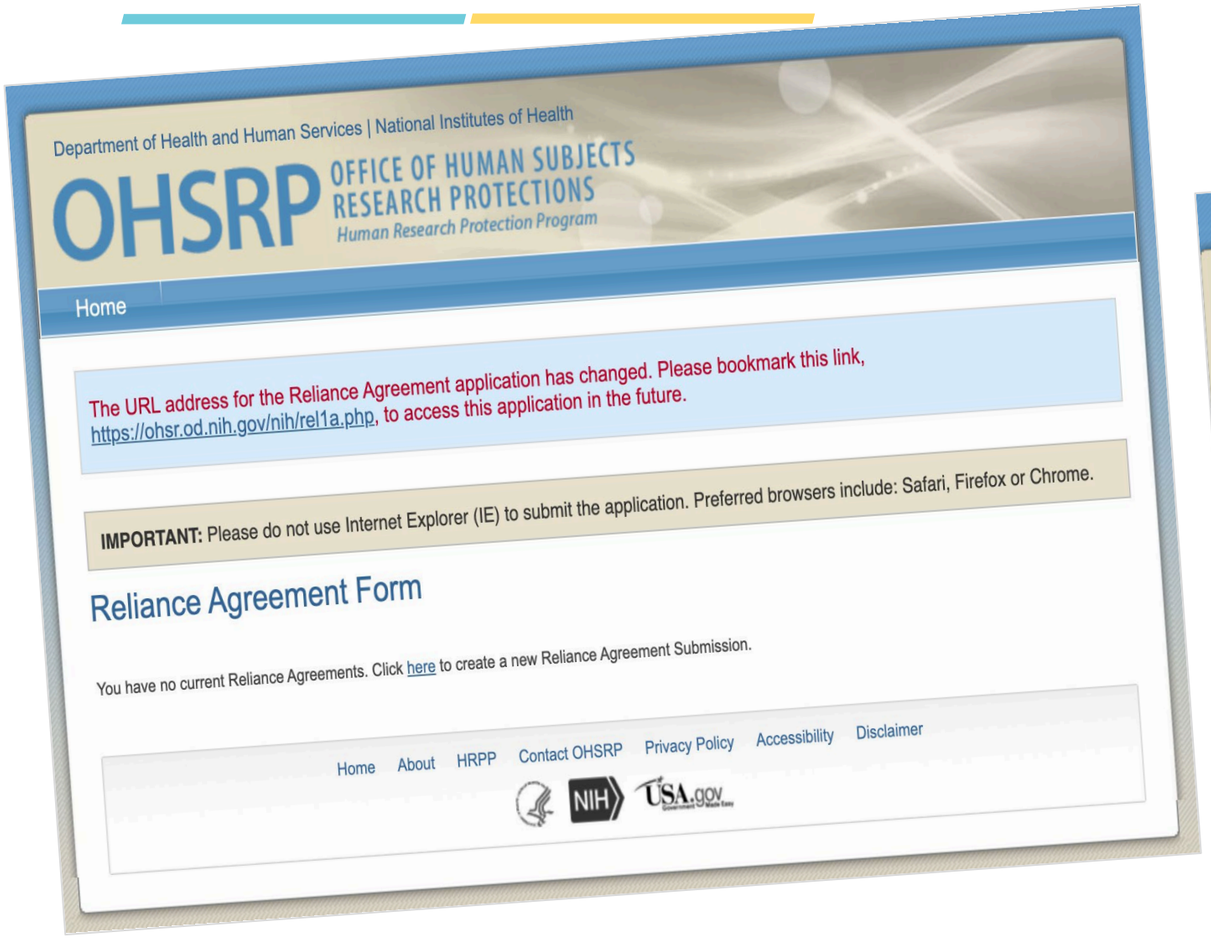


Supporting Documentation for Reliance Application

To complete the request for a Reliance Agreement, additional supporting information is required and should be submitted to NIH IRBO via irb@od.nih.gov

If you are an NIH Investigator requesting to rely on an external Reviewing IRB:

- Complete the **NIH RESEARCH ACTIVITIES FORM, REQUEST TO RELY UPON AN EXTERNAL IRB** (available from IRBO) this will allow you to describe the NIH's proposed research activities

If you are an NIH Investigator requesting that an external institution rely on the NIH IRB submit one of the following documents:

- Complete a **Non-NIH RESEARCH ACTIVITIES FORM, REQUEST FOR EXTERNAL INSTITUTION TO RELY UPON THE NIH IRB** (available from IRBO) which will allow you to provide a description of the proposed research activities involving the non-NIH investigator(s) in your protocol; OR
- Copy of the **amended protocol (in draft) / protocol addendum (in draft)** that you intend to submit to the NIH IRB which includes a description of the research activities involving the non-NIH investigator(s) and details as to where those activities will take place; OR
- Copy of the **NIH IRB-approved protocol** if it already includes a description of the research activities involving the non-NIH investigators and details as to where those activities will take place

Supporting Documentation for Reliance Application

NON-NIH RESEARCH ACTIVITIES FORM
REQUEST FOR EXTERNAL INSTITUTION TO RELY UPON THE NIH IRB

Instructions: This form should be completed after you've submitted a reliance agreement application requesting that a non-NIH Institution rely upon the NIH IRB. It must be completed for each proposed new site. Once completed, email the form to IRB@od.nih.gov titled *'NIH Research Activities Form [PI Name]_[Non-NIH Site Name].*

PROTOCOL INFORMATION	
Date of Request:	
NIH PI Name and Email:	
Protocol Title and iRIS Number:	
If this protocol has already been reviewed and approved by the NIH IRB, provide date of initial IRB approval:	
Non-NIH Institution Name:	
Non-NIH Site PI Name:	

PROPOSED RESEARCH ACTIVITIES OF THE RELYING INSTITUTION

Mark with an "X" all research activities that the Relying Institution or its study team will conduct on this protocol and indicate the location of those activities.

Research Activity	Yes	At Relying Institution	At the NIH
a. Obtain informed consent	☐	☐	☐
b. Interact with subjects & conduct research activities i.e., carry out research interventions	☐	☐	☐
c. Analyze identifiable data/ specimens	☐	☐	☐
d. Analyze coded data/ specimens and have access to the code key	☐	☐	☐
e. Serve as Coordinating Center	☐	☐	☐
f. Other, please specify:			

NIH RESEARCH ACTIVITIES FORM
REQUEST TO RELY UPON AN EXTERNAL IRB

Instructions: This form should be completed after you've submitted a reliance agreement application requesting to rely upon an external IRB. We ask for comprehensive responses and, when completed, for the form to be sent to IRB@od.nih.gov titled *'NIH Research Activities Form_[PI Name].'*

PROTOCOL INFORMATION	
Date of Request:	
NIH PI/ Lead Investigator Name and Email:	
Protocol Title:	
Has this multi-site study already been reviewed and approved by an IRB (e.g. is this an on-going study)? If so, provide name of Reviewing IRB and date of initial IRB approval.	

NIH'S PROPOSED RESEARCH ACTIVITIES ON THE PROTOCOL

Mark with an "X" all research activities that the NIH will be conducting on this protocol and indicate the location of those activities.

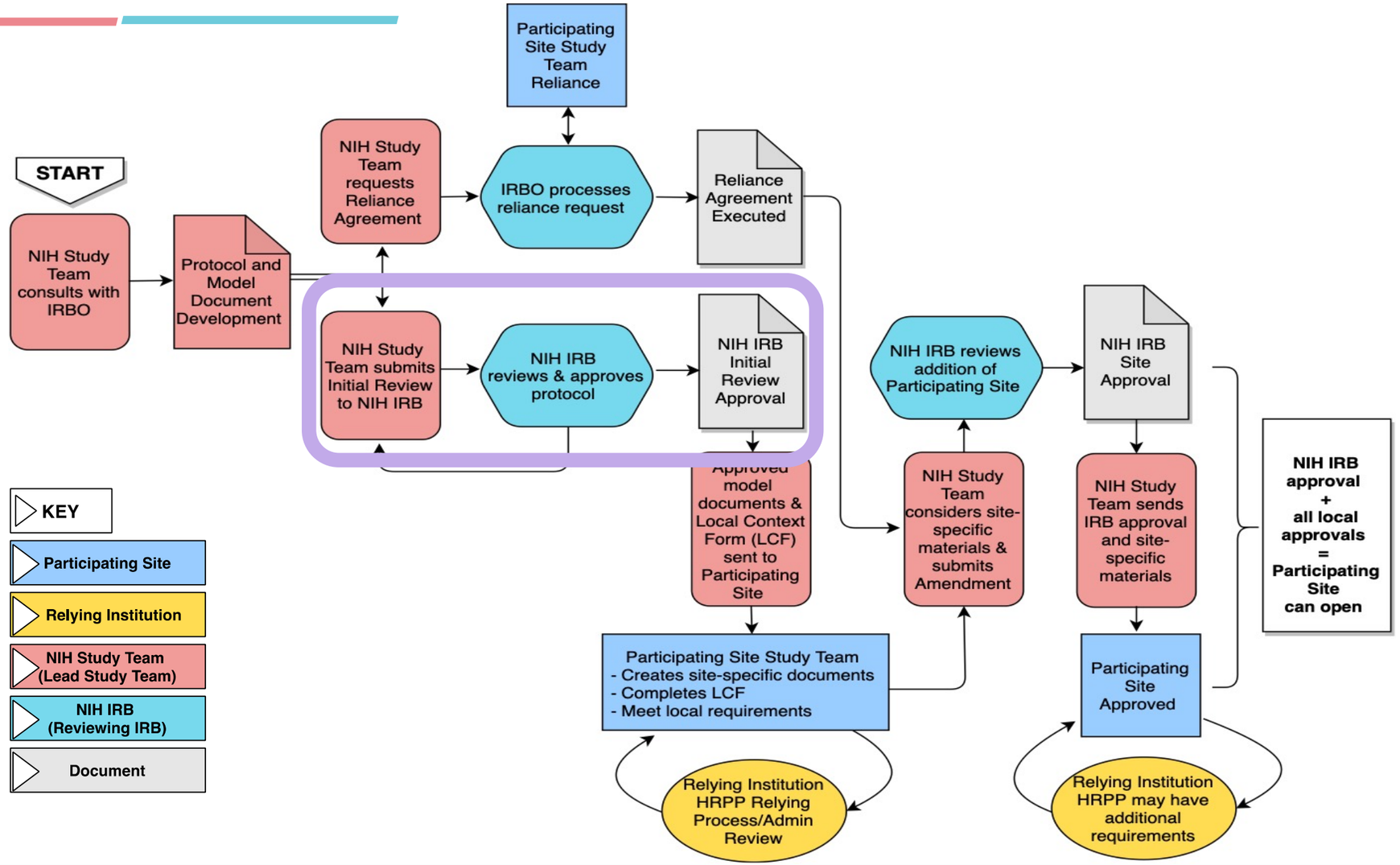
Research Activity	Yes	At NIH Site	Off-Site
a. Obtain informed consent	☐	☐	☐
b. Interact with subjects & conduct research activities i.e., carry out research interventions	☐	☐	☐
c. Analyze identifiable data/ specimens	☐	☐	☐
d. Analyze coded data/ specimens and have access to the code key	☐	☐	☐
e. Serve as Coordinating Center	☐	☐	☐
f. Other, please specify:			

Reliance Considerations – NIH is Reviewing IRB

- Establish whether the proposed Participating Study Team/s need NIH IRB oversight
  - Will NIH be obtaining informed consent or interacting, intervening or collecting identifiable private information from living individuals for research purposes?
- Confirm whether NIH IRP is subject to an sIRB mandate
- IRBO issues the reliance agreement and works with the Reviewing IRB to facilitate the agreement using templates previously approved by the NIH Office of General Counsel (OGC)
- IRBO informs the NIH PI when the fully executed agreement is received.

NIH IRBO will accept the submission to add the Participating Site to the protocol **after the Reliance Agreement is in place.**

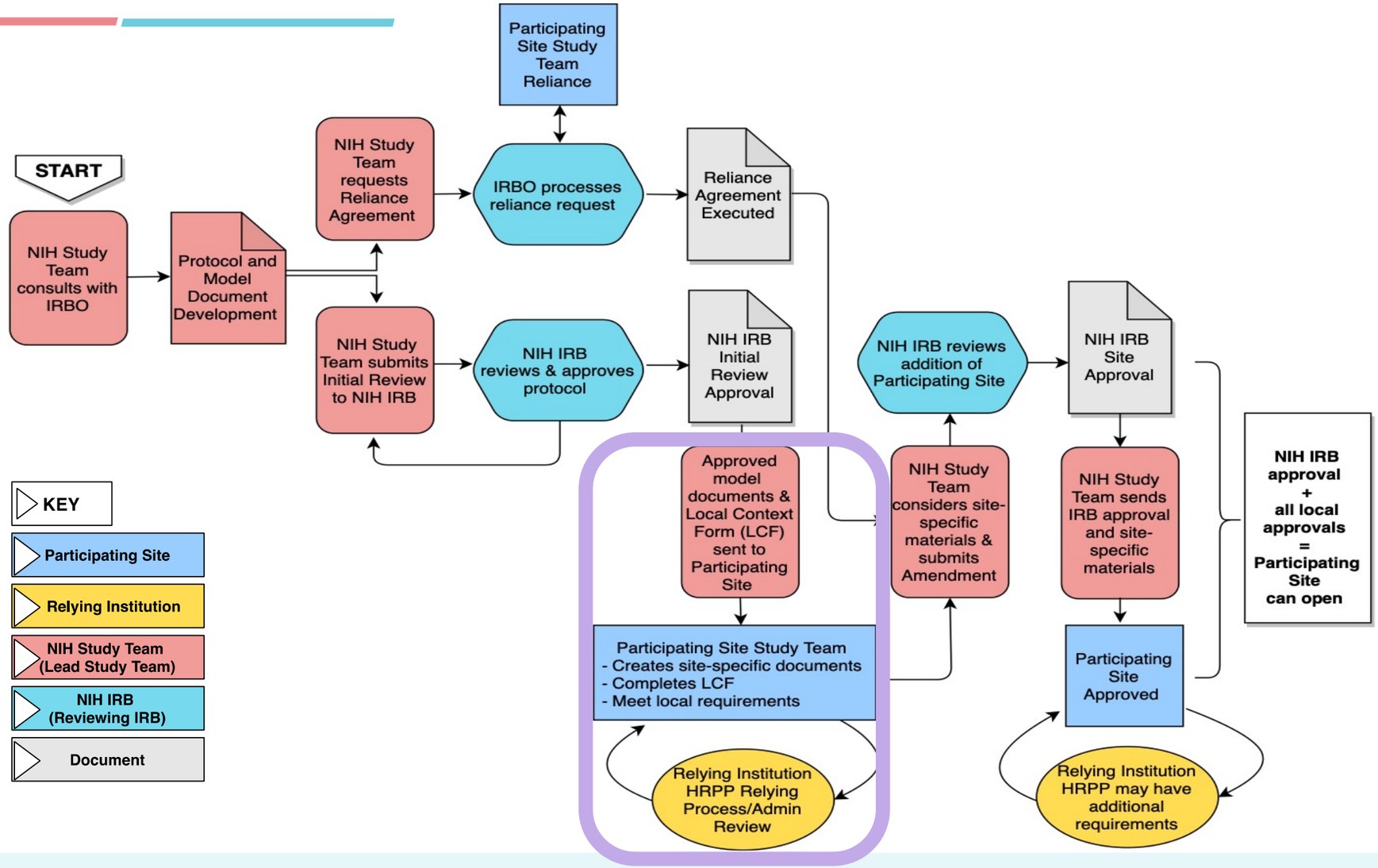
OVERVIEW: NIH – Lead Site Study Team & Reviewing IRB



Initial Review – NIH - Lead Site Study Team & Reviewing IRB

- Two-part submission process (Lead Site and Participating Sites)
  - Participating sites are reviewed *after* the Lead Site is approved
- Lead Site submission similar to a Single Site Initial Review submission
- Lead Study Team submits the Initial Review submission in iRIS
- NIH IRB reviews the Initial Review submission per regular process
- NIH IRB will review and approve:
  - Main Protocol
  - Model documents (consent; recruitment material)
  - NIH site-specific documents
  - NIH Key Study Personnel Page
  - Communication Plan, if available
  - Consent waiver requests
  - Other study documents

OVERVIEW: NIH - Lead Site Study Team & Reviewing IRB



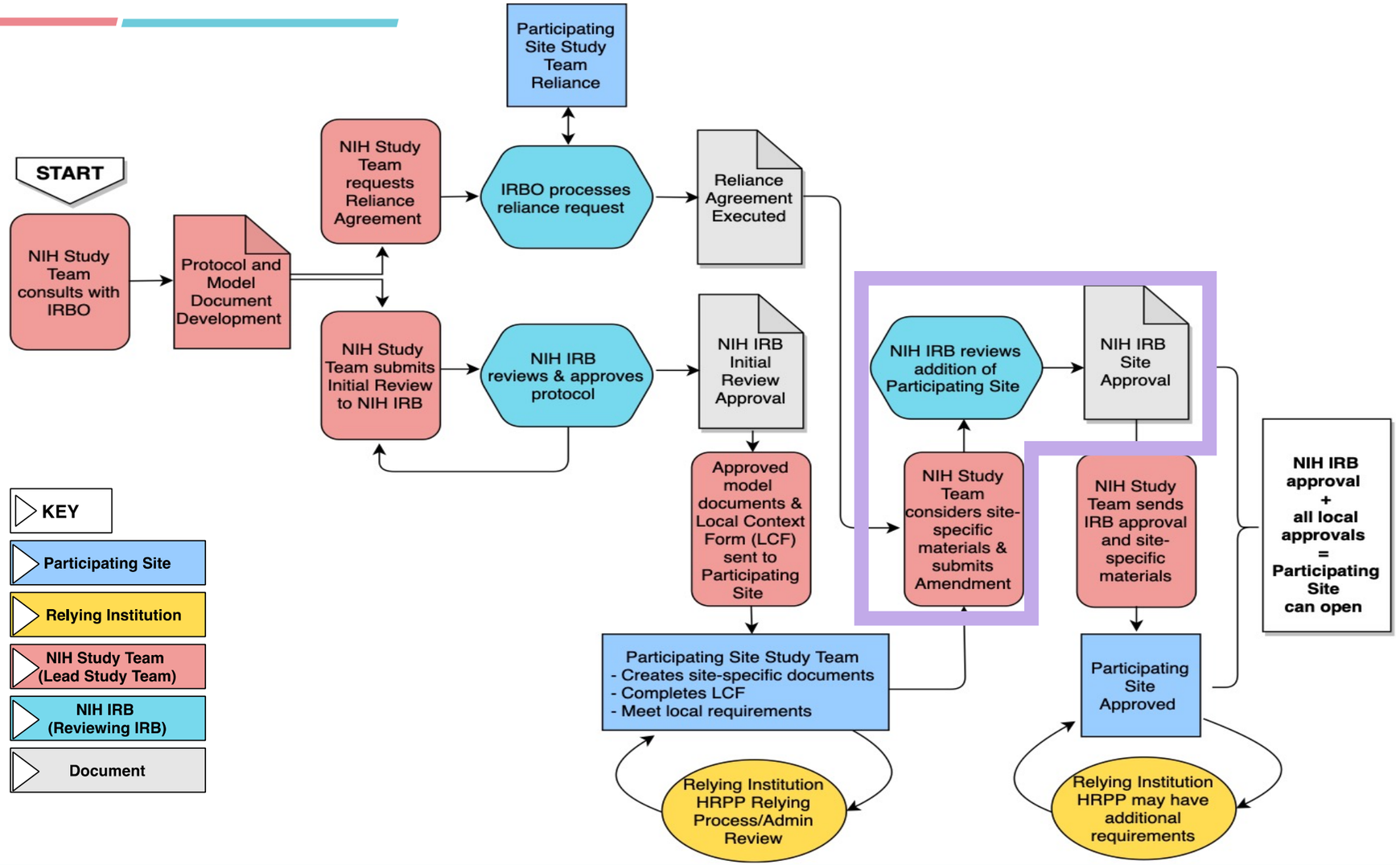
Participating Site Study Team Document Preparation

- NIH Lead Site Study Team provides Participating Site(s) with:
  - Approved protocol
  - Master consent/ assent documents
  - Other master documents, e.g. recruitment material

- Participating Site completes the documents
  - Lead Site Study Team will work with Participating Site as needed
  - Site submission is based on the Lead Site's submission
  - Tailor model documents (consent(s); recruitment materials)
  - Local Context Form (provides information specific to the site)
  - Protocol Addendum (if applicable)
  - Site study team works with Relying Institution's HRPP process for local ancillary review
    - Lead study team should factor this into projected site onboarding time

- Justification for site specific changes (requirement or preference?)
  - Recruitment and compensation practices may be different
  - Relying Institution's non-negotiable requirements, e.g. research related injury language

OVERVIEW: NIH - Lead Site Study Team & Reviewing IRB



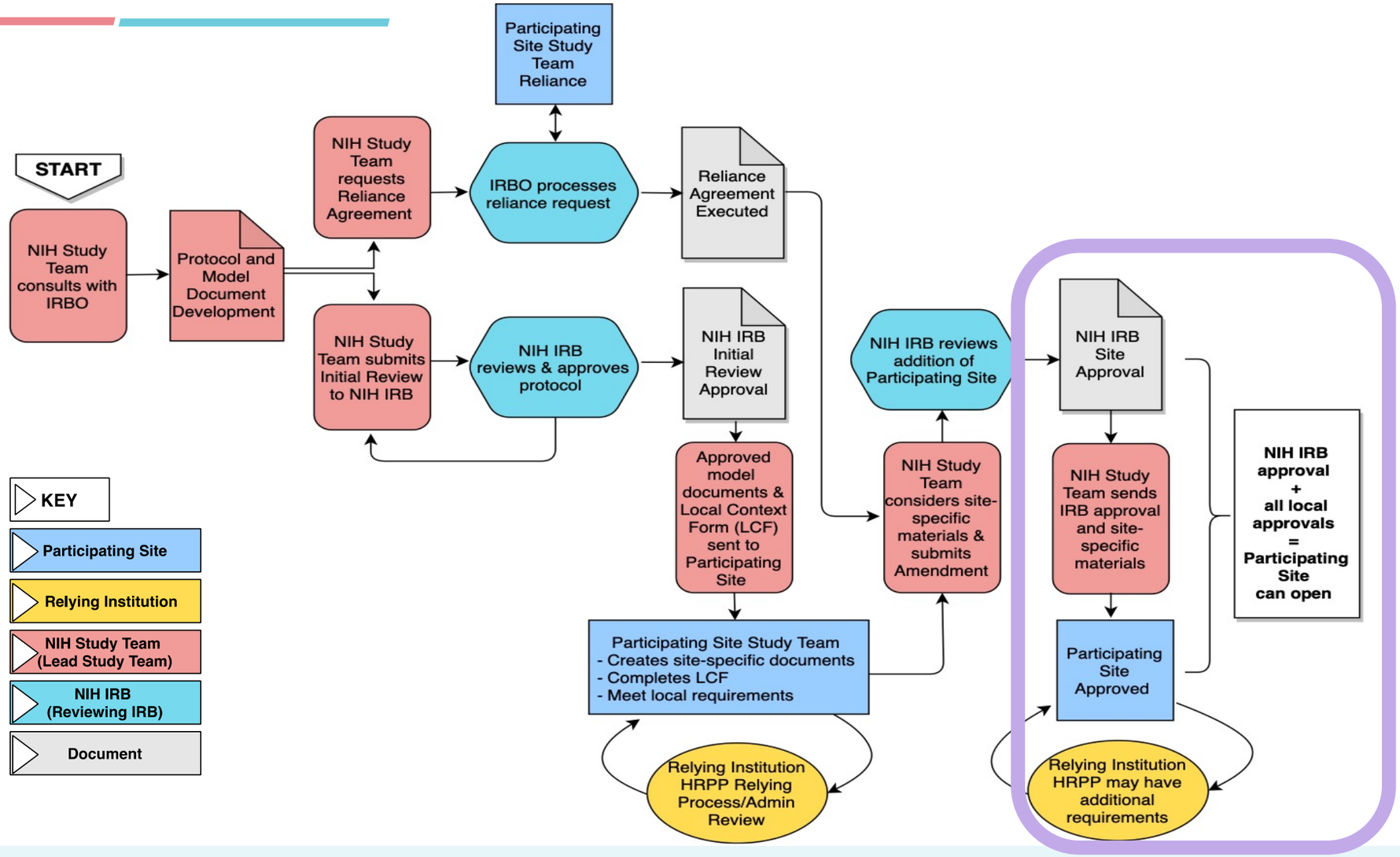
Participating Site Submission Process

- Participating Site submission occurs after Reliance Agreement is in place
- Participating Site Study Team submits site specific documents to Lead Site Study Team (currently outside of iRIS; *Future state: Participating sites' submissions will occur via iRIS when the multi-site module goes live)*
- Lead Site Study team verifies documents are correct; return to site if incomplete
- Lead Study team submits Participating Site application via an Amendment Form in iRIS
- Reviewed via expedited review (in most cases; site specific changes may affect review criteria)
- NIH IRB approves Participating Site Principal Investigator
  - Participating Site will review local study team per site's institutional requirements

NOTE:

- NIH IRB does not serve as a Privacy Board and therefore does not review HIPAA Authorizations or waivers of HIPAA Authorizations. Participating Sites that are covered or hybrid entities are responsible for complying with HIPAA requirements and need their own IRB or Privacy Board to review in that capacity. Participating Site must ensure authorizations or waivers are in place and <u>NIH Lead Site Study Team must verify if receiving Protected Health Information from the site.</u>

OVERVIEW: NIH Team as Lead Site Study Team & Reviewing IRB



Participating Site Activation

- The NIH Lead Site Study team has responsibility for providing the Participating Site Study team with the site's NIH IRB approval letter and approved documents
- Continuing Review (if required) is set by the overall study/lead site and applies to each site regardless of site approval date
- From NIH's perspective, Participating Site is approved, however, there may be outstanding Participating Site local requirements after site IRB approval
  - NIH Lead Site Study Team manage expectations and learn during protocol development/site selection phase what may be required prior to subject enrollment at the site

Continuing sIRB Oversight

NIH Lead Site Study team will:

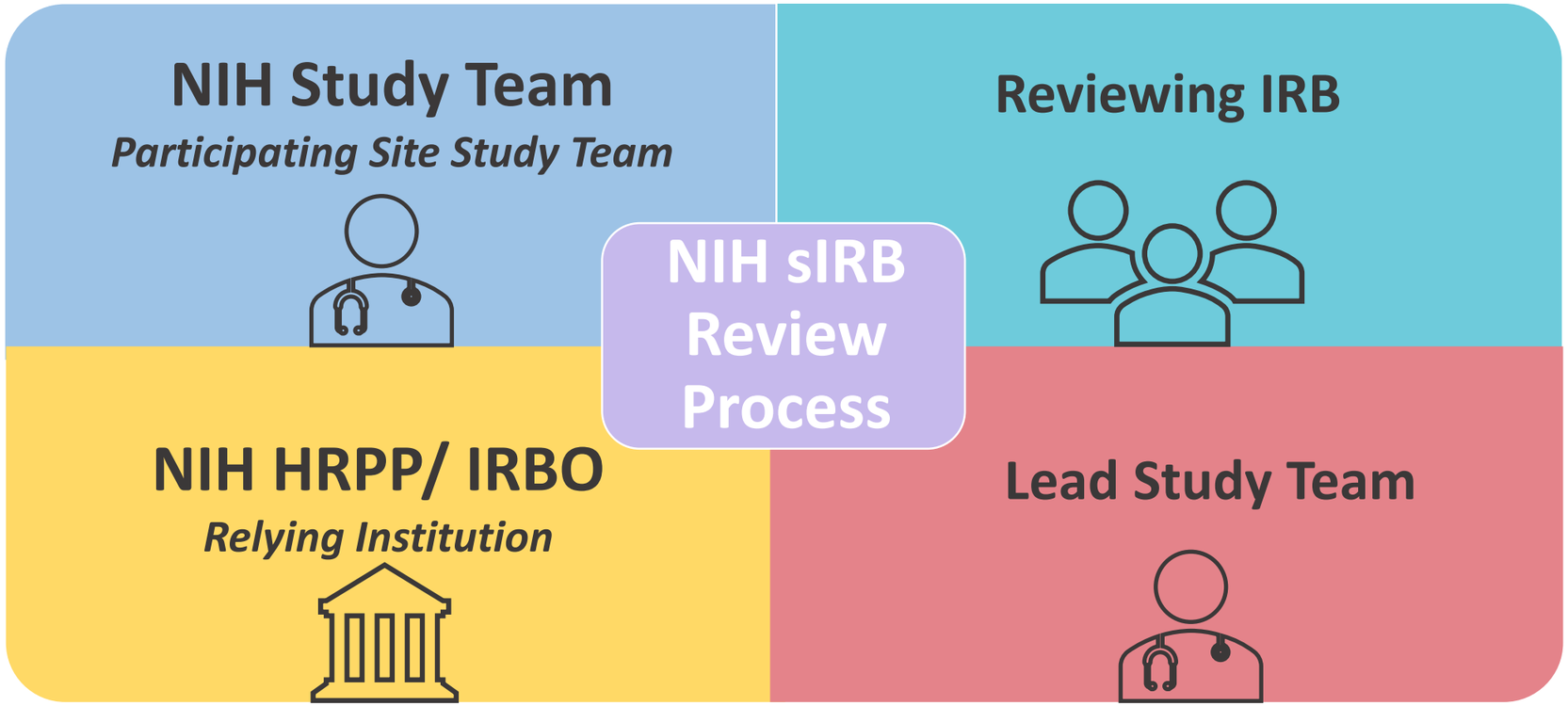
- Submit Amendments, Continuing Review, Event Reporting, and Closures both study-wide and at the level of Participating Sites
- Facilitate Participating site-specific IRB submissions
- Ensure protocol compliance and safety monitoring
- Facilitate audits
- Serve as the key communicator between the Reviewing IRB and Participating Sites

Continuing sIRB Oversight

NIH as the Reviewing IRB will:

- Perform standard IRB functions to ensure continued approval of the research and the protection of participants
- Review according to applicable regulations and policies for amendments, continuing reviews and problem reports
- Ensure necessary compliance monitoring of all sites conducting the research
- Communicate with the relying HRPPs to address problem events or to consult before reporting to the regulatory bodies

Key Players: NIH Study Team Relying on External Reviewing IRB



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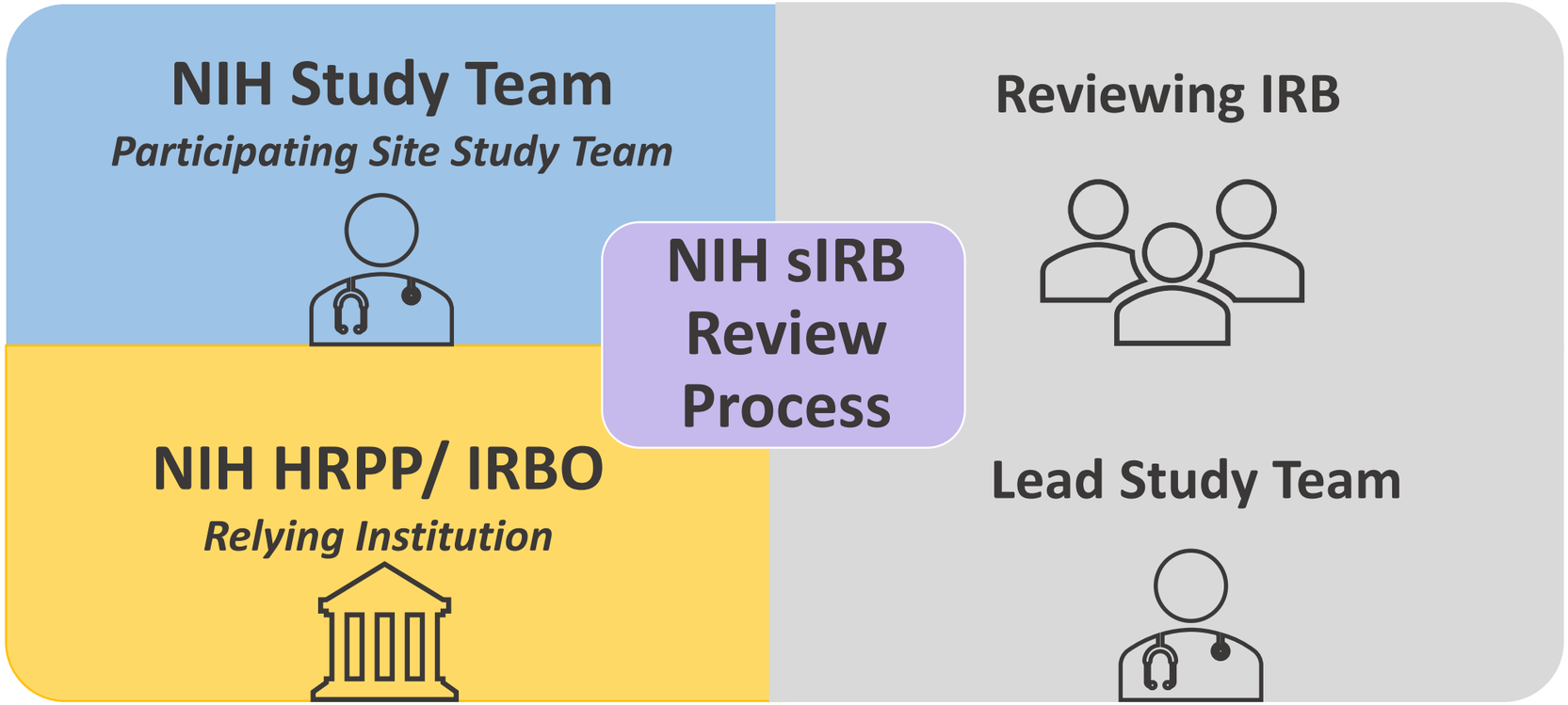

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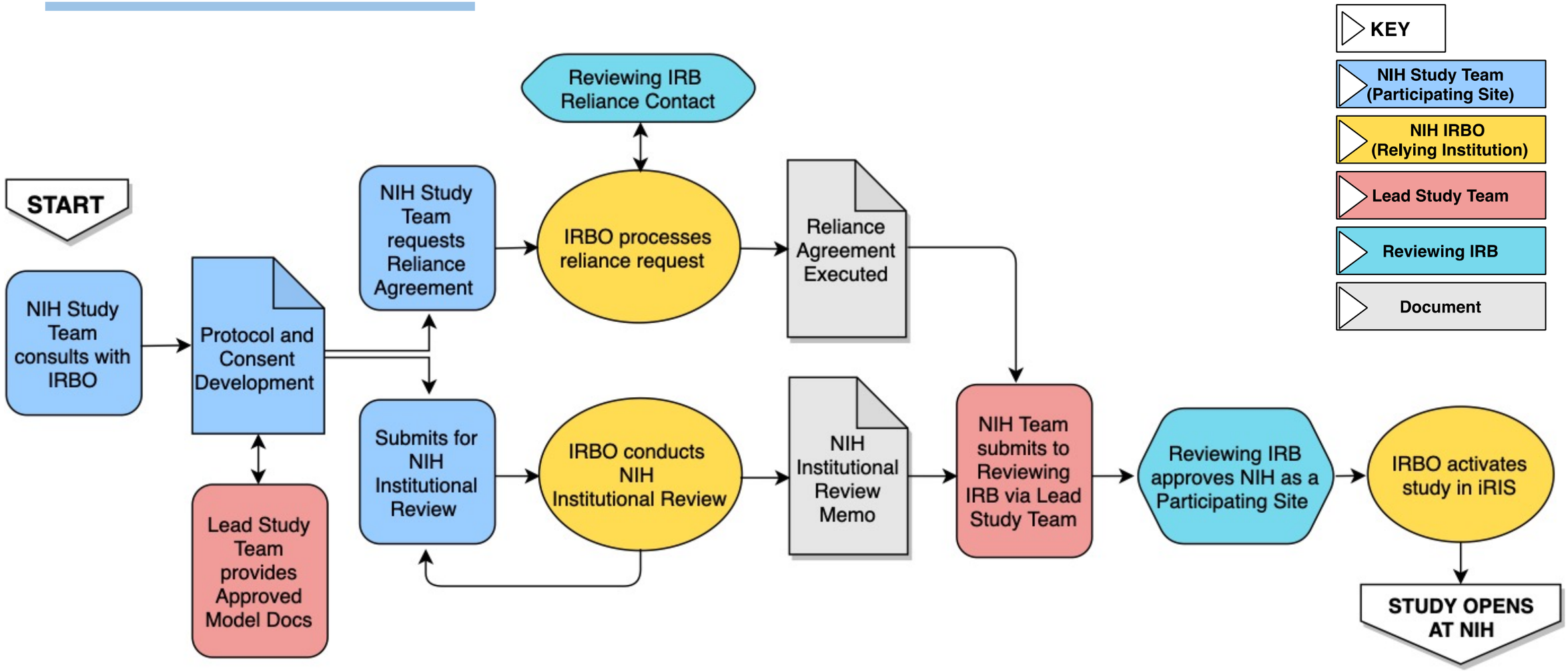

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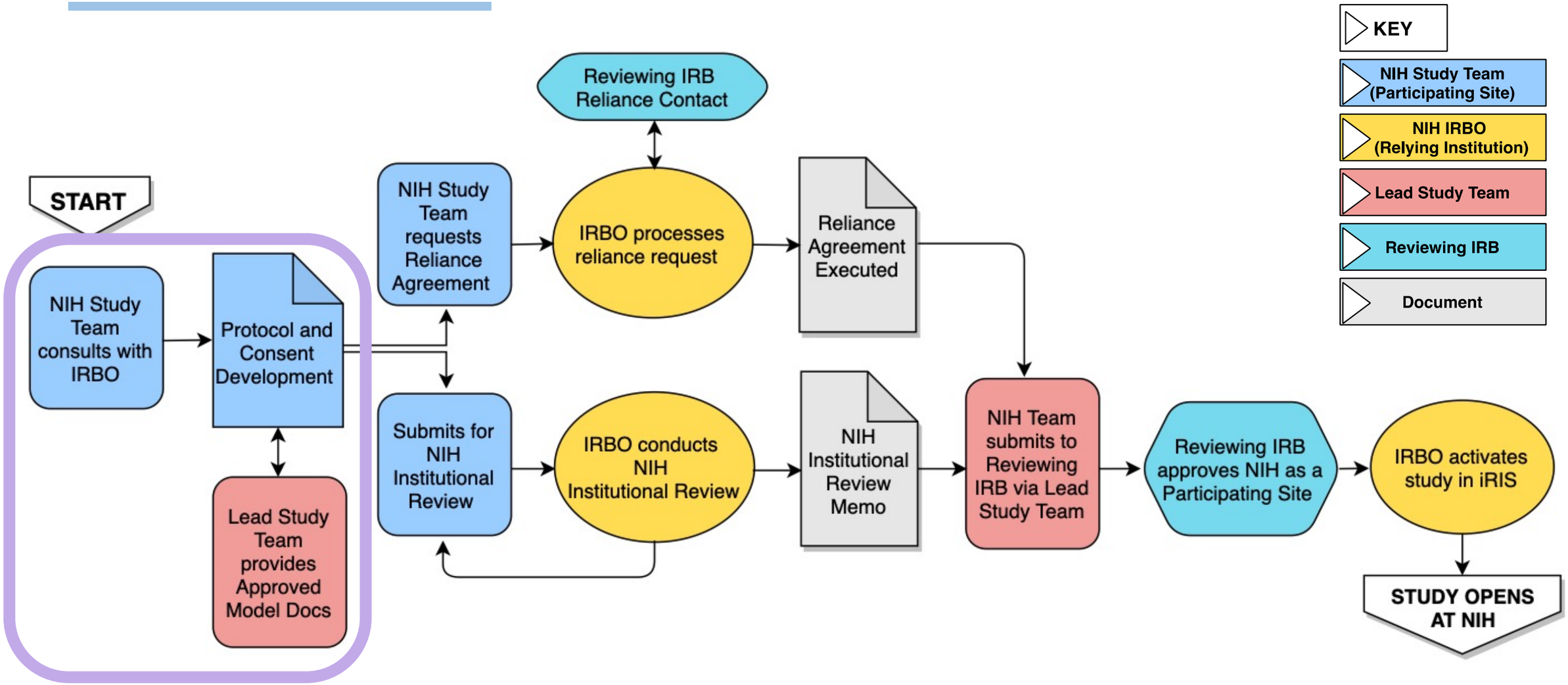


IRBO Consult - NIH Study Team Relying on External Reviewing IRB

	NIH Relying on External Reviewing IRB
Reliance Agreement	• Establish NIH is engaged in HSR and needs IRB oversight • Provide overview of requesting a Reliance Application • Discuss potential need for negotiation over reliance terms
IRB Selection	• Establish which sIRB mandates apply, if any • If early in the process, and there's discretion, consider if selected IRB is appropriate choice
Local NIH Requirements	• NIH Institutional Review • Ancillary Reviews • Maintenance of a shadow protocol • Training & Qualifications • Reporting Requirements
Study Planning	• Study Team resources • Tools and templates – from the NIH, Lead Study Team, and the Reviewing IRB • Take time to identify and review the "rules of engagement" for the key players, esp. Reviewing IRB • Communication Plan

NIH Protocol Addendum and Site Consent Development

NIH Protocol Addendum

- Supplements the Main Protocol Document and must be read in conjunction with it - should not duplicate
- Describe NIH's proposed role in the research and applicable NIH institutional requirements
- Ensure that the Reviewing IRB understands how the protocol will be implemented at the NIH
- Expand on protocol content by:
  - Correcting assertions that something is going to be done at the NIH site when it will not *and/or*
  - Describing when the NIH will do something *differently*, or *in addition,* to what is described in the protocol

➢ Distinct from NIH Protocol Supplements developed when the NIH is going to be implementing a Sponsor Protocol and the NIH is the Reviewing IRB.
  - These supplements tend to be more comprehensive documents that need to satisfy all NIH HRPP and IRB requirements

NIH Protocol Addendum – Examples of Typical Content

Institutional and Operational Requirements:

- Adding NIH IRB# and identifying involved NIH sites, especially when go beyond the NIH CC
- NIH not subject to state law, will not bill insurance, and primarily a research facility
- NIH study team will report events to OHSRP in addition to reporting to the Reviewing IRB

Protocol Implementation:

- Describing ways in which screening, recruitment, compensation, reimbursement, or procedures will be conducted differently, or not at all, at the NIH, such as:
    - NIH will enroll a specific cohort
    - NIH will perform an extra scan and questionnaire

Consent Implementation:

- Assent process for children e.g., format, variation by age group, documentation method etc.
- Determining subject capacity and adherence to SOP 14E
- Enrolment of non-English speakers and use of NIH short form consent
- Re-consenting of subjects who reach 18 and requesting waiver of consent
- Varying consent process to fit the NIH context e.g., documenting assent on research record

NIH Protocol Addendum and Site Consent Development

NIH Site Consent/ Assent Documents

- Developed from the approved “Model Consent/Assent”
- Generally, NIH study team needs to customize to include NIH institutional requirements and communicate how the protocol is going to be implemented at the NIH
- Usually involves either inserting NIH language into the Model Consent or placing Model Consent language into the NIH template
- Acceptable to retain language from the Model Consent when equivalent to NIH template language - some exceptions e.g. research-related injury, Certificate of Confidentiality etc.
- Need to be consistent with the NIH Protocol Addendum
- Evolving craft where there may be a need for negotiation between the key players and where all parties are learning to compromise as well as identify what are true non-negotiables
- Where possible, prudent to establish what are the acceptable parameters for the Sponsor, the Reviewing IRB, NIH, and potentially with the Lead Study Team

NIH Site Consent – Examples of Typical Customization

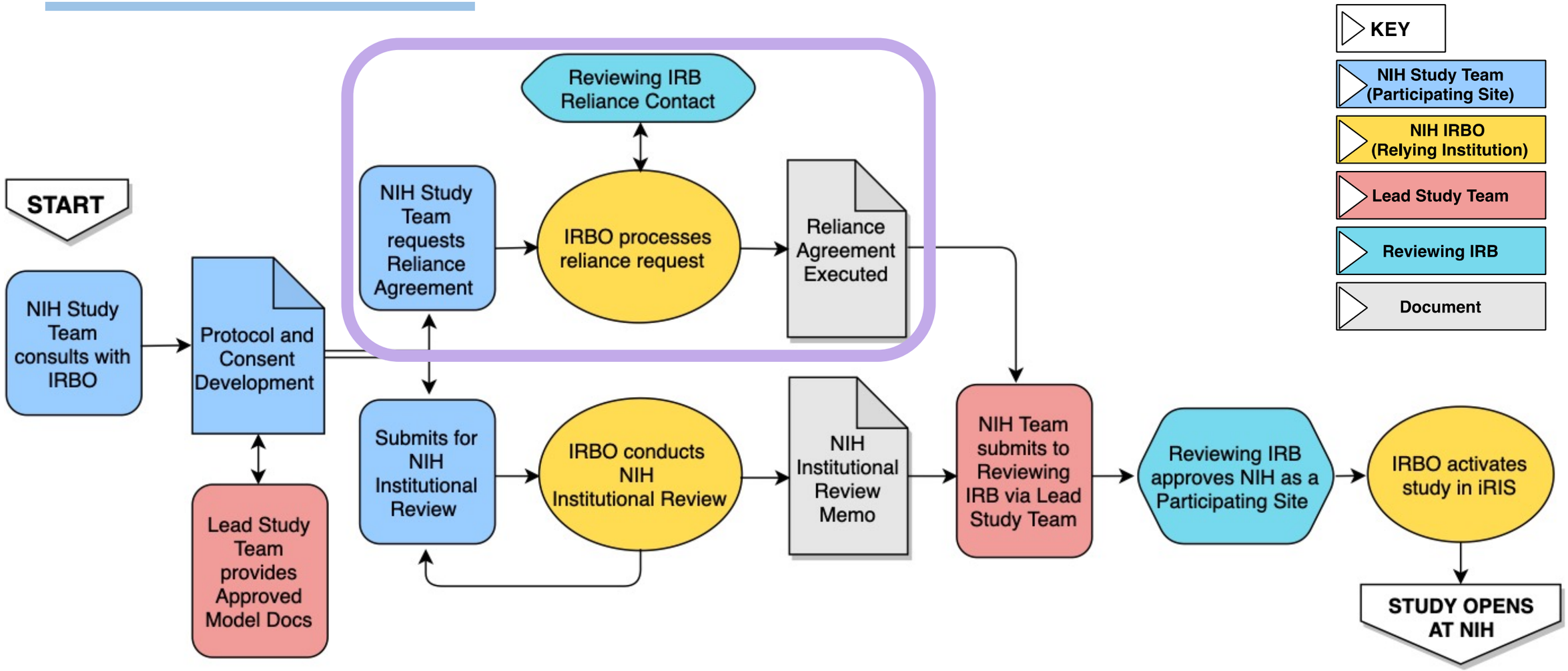
Adding:

- Adding NIH IRB number
- NIH CC header and footer, including consent #
- Compensation and reimbursement language
- Applicable NIH research-related injury language
- Certificate of Confidentiality language
- Privacy Act language
- Appropriate sections of the NIH signature block

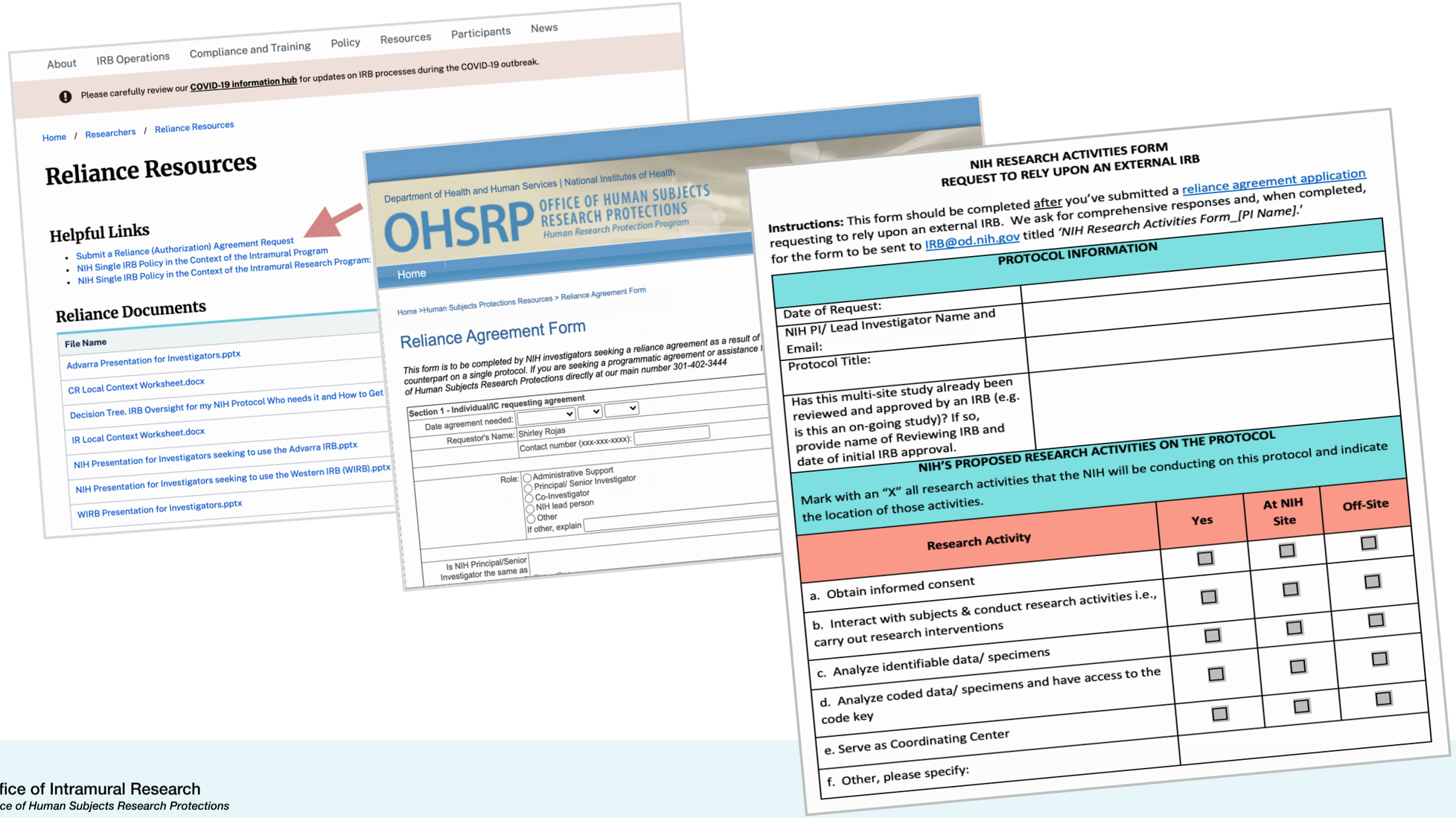
Deleting:

- HIPAA-related text
- Assertions that insurance will be billed
- Assertions that subjects can continue clinical care at the NIH if withdraw
- References that combine Sponsor and Study Site conduct or responsibilities

OVERVIEW: NIH Study Team Relying on External Reviewing IRB



Initiating a Reliance Agreement Request



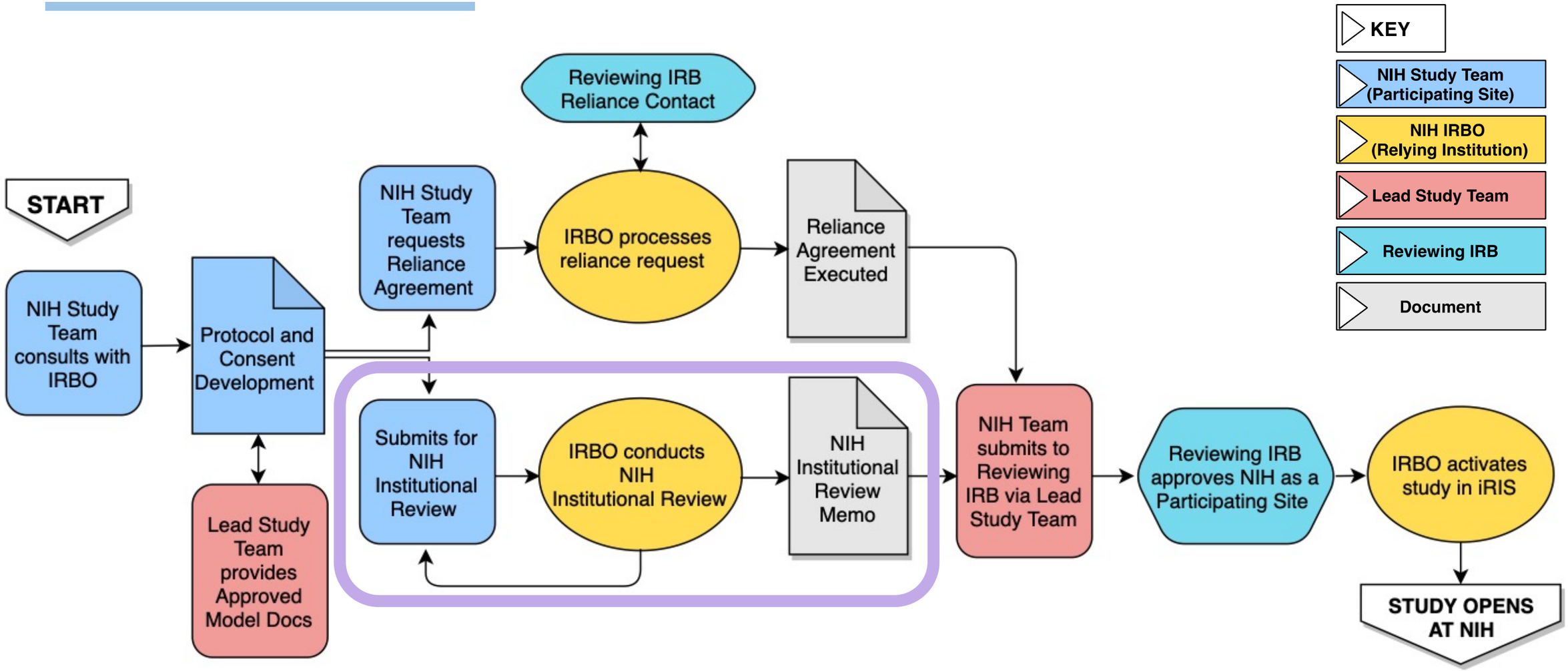
Reliance Considerations – NIH is Participating Site Study Team

- Establish whether the NIH Study Team needs IRB oversight
  - Will NIH be obtaining informed consent or interacting, intervening or collecting identifiable private information from living individuals for research purposes?
- Confirm whether NIH IRP is subject to an sIRB mandate
- Confirm whether Reviewing IRB is AAHRPP accredited or has undergone equivalent assessment
- Reach out to the Reviewing IRB and establish "rules of engagement"
- Determine whether reliance terms are acceptable and negotiate until able to finalize terms
- IRBO informs the NIH PI when the fully executed agreement is received - when process allows

Once Reliance Agreement is in place *and* NIH Institutional Review Memo has been issued

NIH Study Team can submit to the external Reviewing IRB

OVERVIEW: NIH Study Team Relying on External Reviewing IRB



NIH Institutional Review

- NIH Study Team submits protocol documents to IRBO for an administrative review *before* submitting to the external Reviewing IRB
- Confirms that all NIH institutional requirements have been addressed
- Ensures that NIH is operating according to terms of its Federalwide Assurance
- It is NOT equivalent to an IRB review
- NIH Study Team prepares a submission into iRIS
- IRBO reviews the submission
- Once completed, issues an **NIH Institutional Review Memo**
- NIH study team permitted to submit amendment to the Reviewing IRB

NIH Institutional Review

NIH Study Team

(Participating Site Study Team)

Submits into iRIS as Initial Review:

- Model Protocol
- Model Consent(s)/Assent(s)
- NIH Protocol Addendum
- NIH Consent(s)/Assent(s)
- Study Personnel Page
- Ancillary Reviews e.g., DEC, RSC, Scientific Review, IBC, PRIA etc.
- Initial Review IRB Approval Letter*

NIH IRBO (Relying Institution)

Conducts Institutional Review

- Ensures NIH Protocol Addendum meets NIH requirements
- Confirms NIH required language in consent documents
- Verifies Ancillary Reviews
- Checks HRPP Training Records

Once completed, IRBO issues via iRIS:

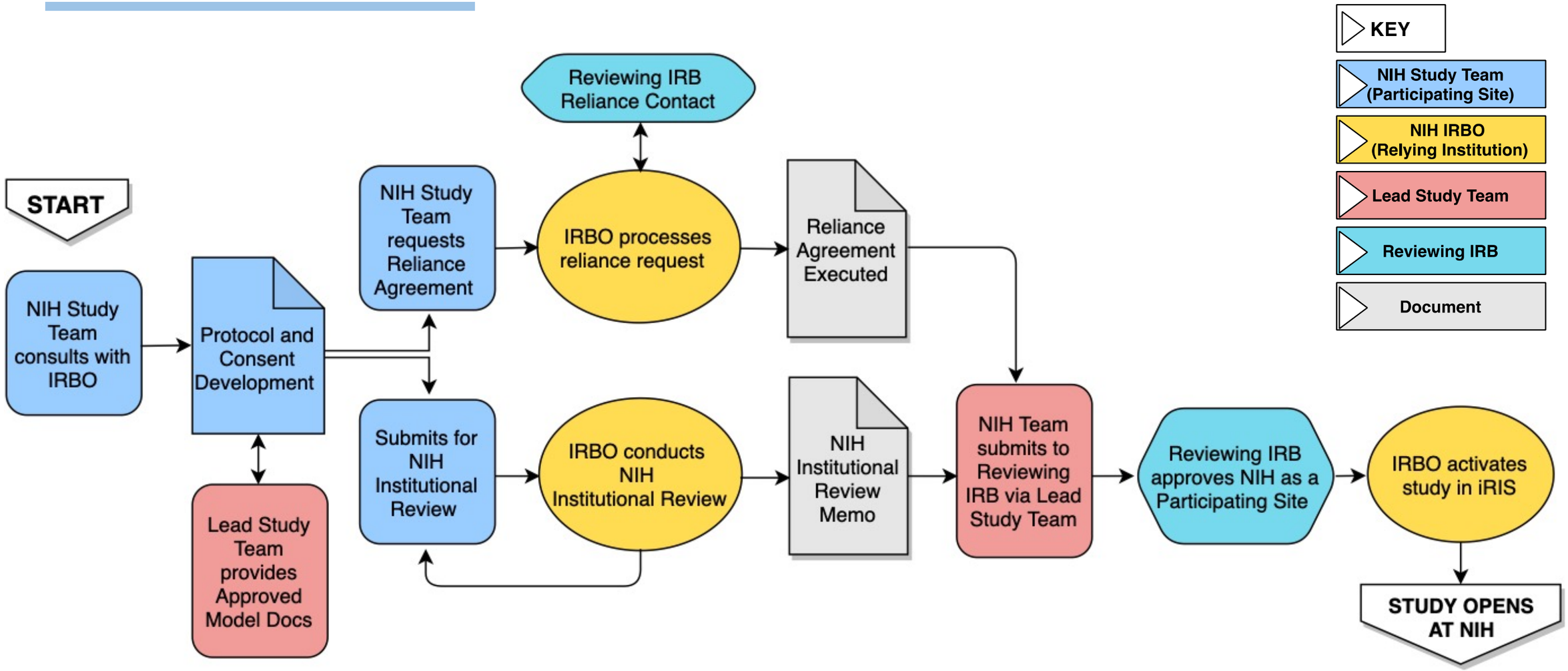
NIH Institutional Review Memo

PLUS a Stipulation

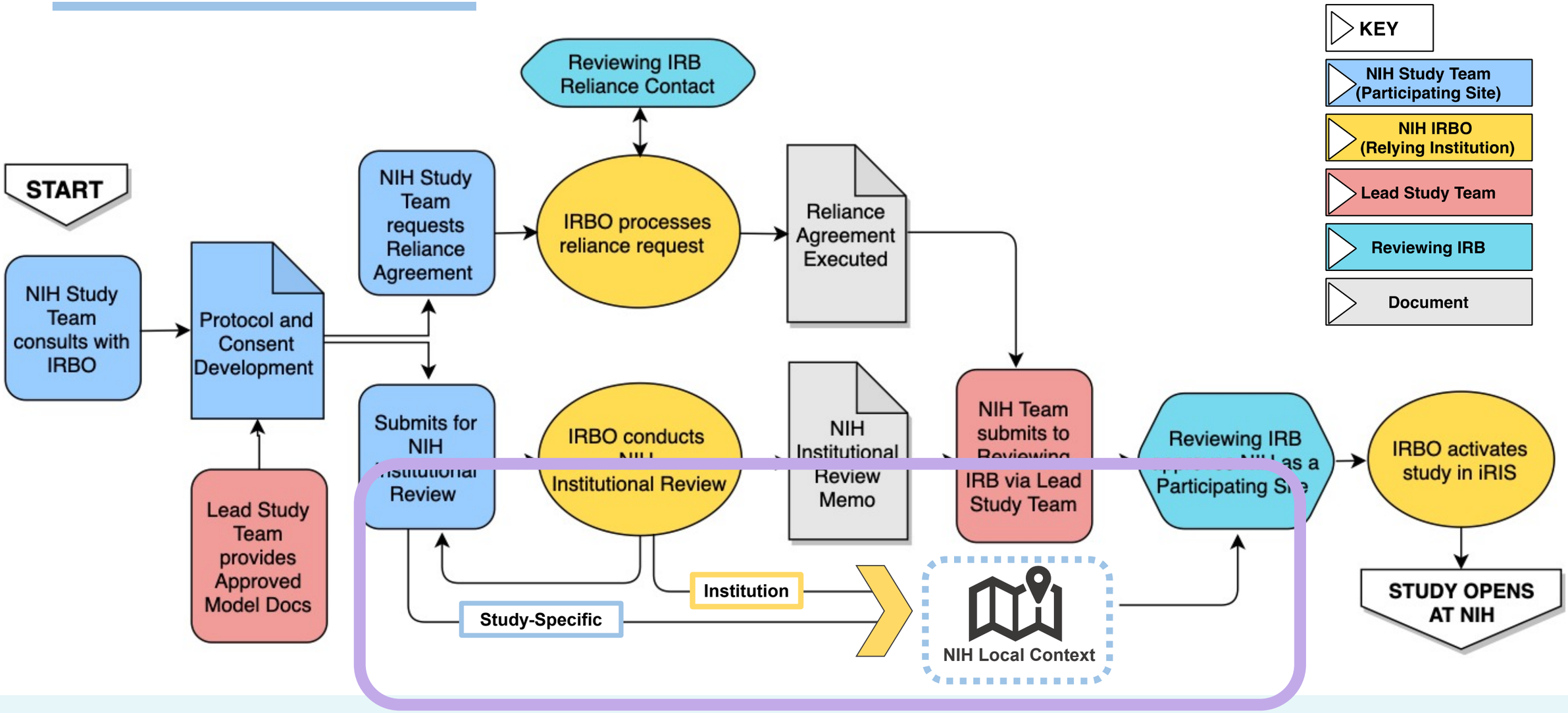
- Confirms that submission meets NIH institutional requirements
- Serves as “green light” to NIH Study Team that can move forward and submit to Reviewing IRB
- If required, provides additional guidance on submission
- Provide to Reviewing IRB

* Optional

OVERVIEW: NIH Study Team Relying on External Reviewing IRB

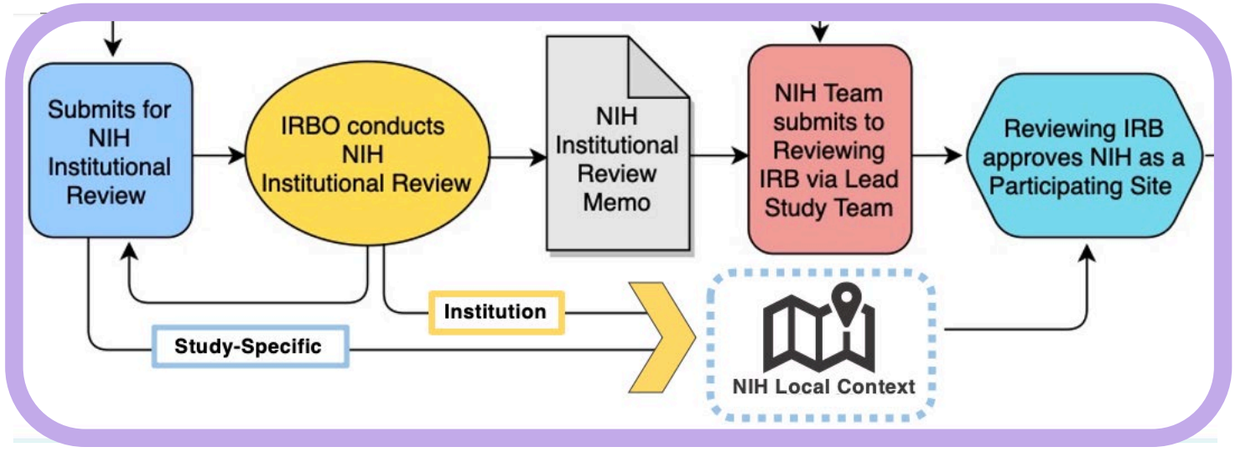


OVERVIEW: NIH Study Team Relying on External Reviewing IRB

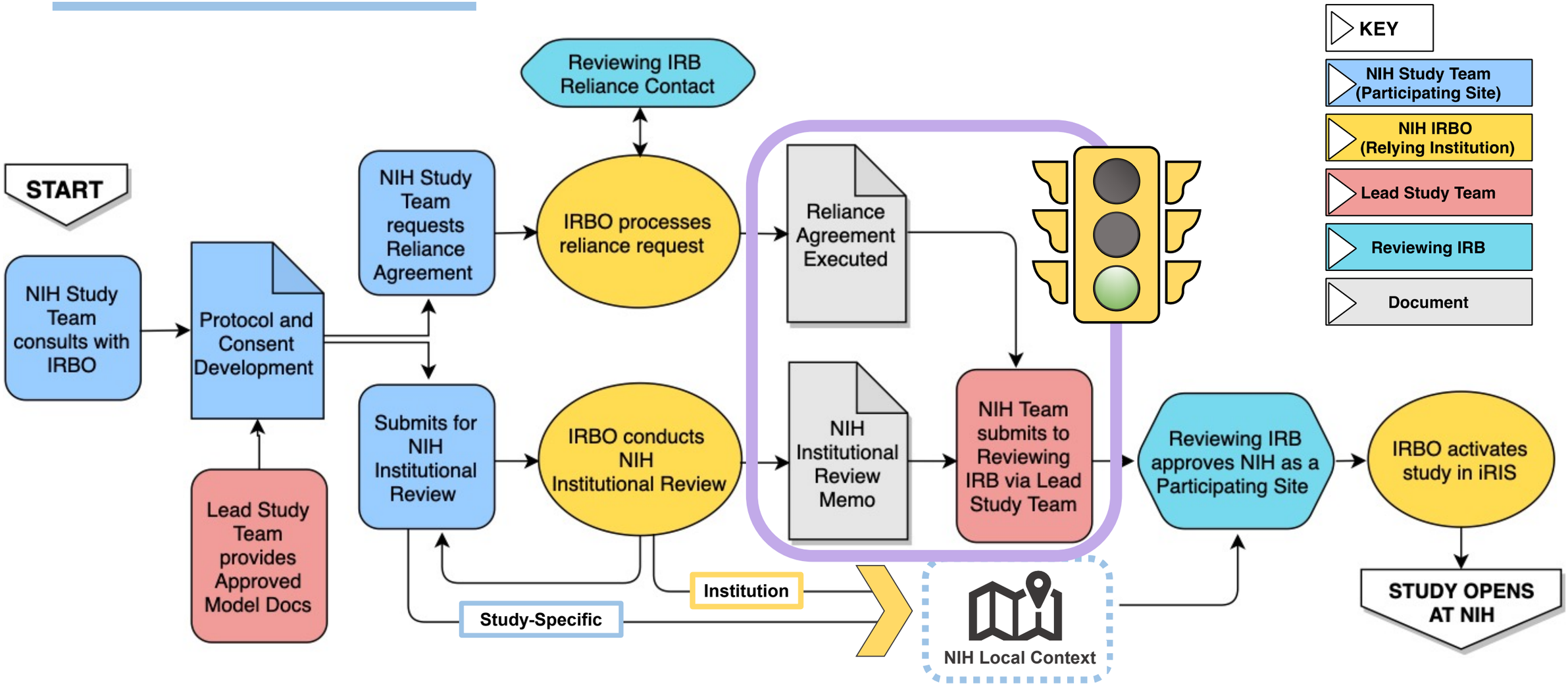


NIH Provides Local Context

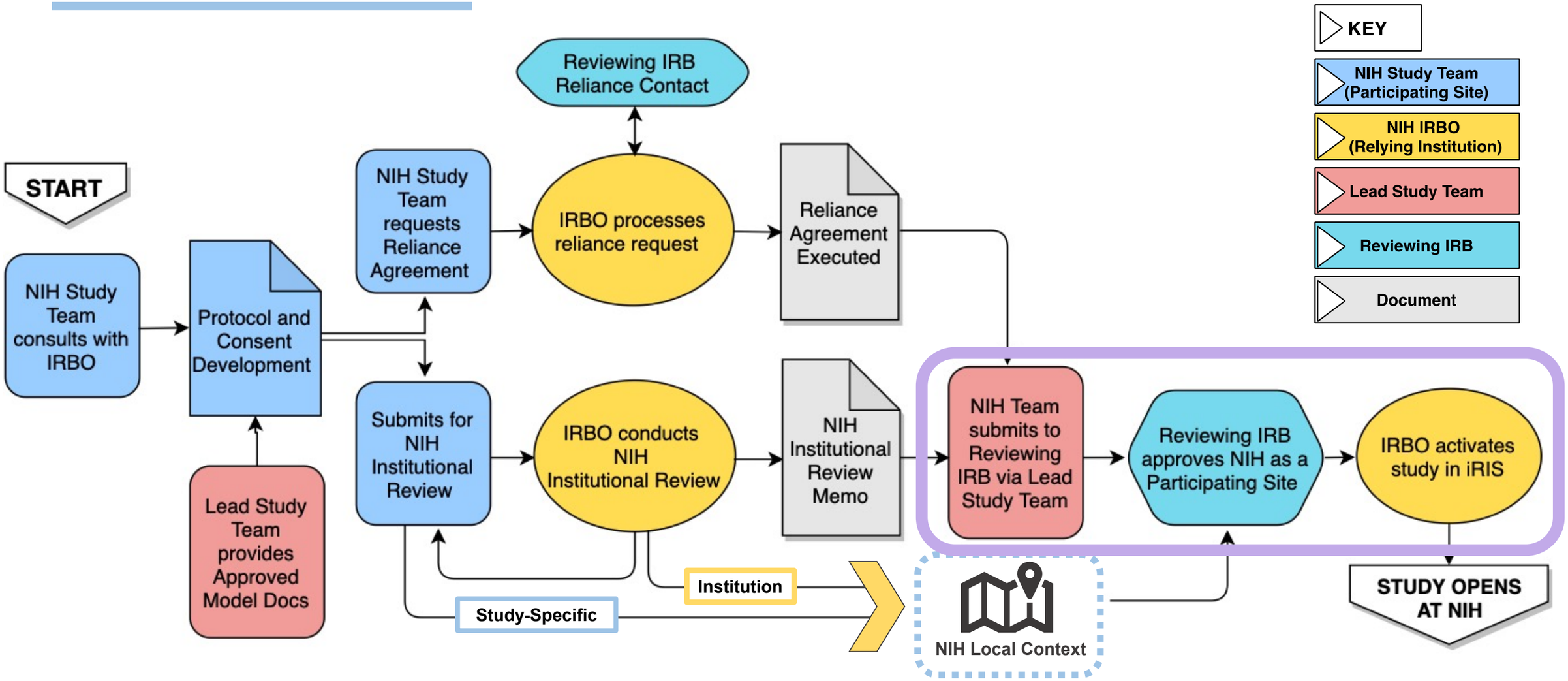
- Reviewing IRB needs to understand applicable NIH policies, local norms, special requirements, culture, etc. in order to conduct its review. This is called “Local Context”
- Comprised of information specific to NIH as the **Relying Institution** AND **study-specific** information relating to how the protocol will be implemented at the NIH site
- Identifying pertinent local context information is a collaborative effort involving the NIH Study Team and NIH IRBO
- Encompassed in stand-alone local context forms or institutional profiles (e.g., NCI CIRB) or described in site specific documents (e.g., site-specific consents and NIH protocol addendums)
- May require provision of NIH policies/ templates
- Initial and on-going consideration for all parties
- NIH IRBO needs to ultimately sign off on information provided
- Submit at time of NIH Institutional Review



OVERVIEW: NIH Study Team Relying on External Reviewing IRB



OVERVIEW: NIH Study Team Relying on External Reviewing IRB



Approval and Activation of NIH as Participating Site

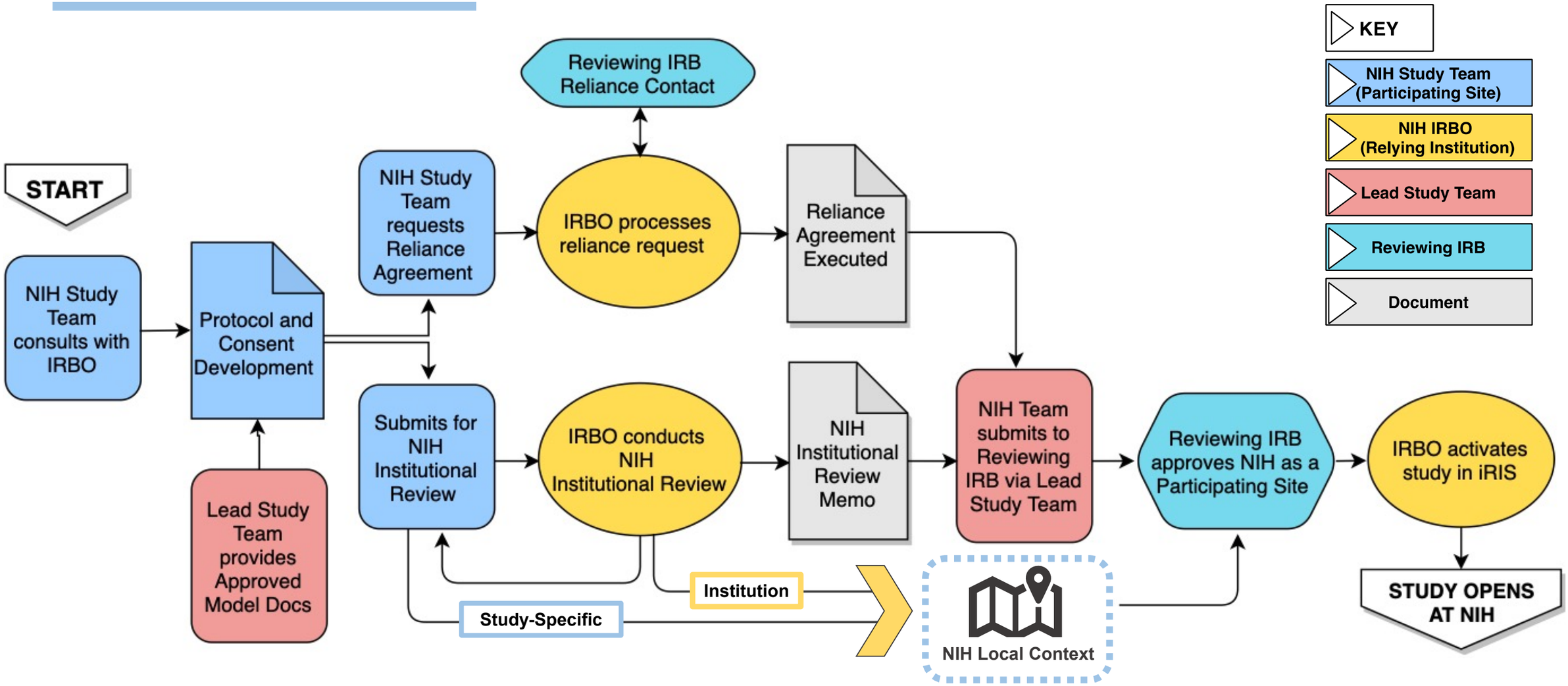
Submission to Reviewing IRB

- NIH Study Team submits to the Reviewing IRB (likely via the Lead Study Team) requesting to be added as a site to the multi-site protocol
- Protocol and Consent documents submitted should be the last version seen by IRBO
- Once NIH is approved as a site by the Reviewing IRB, NIH Study Team must submit the approved protocol and consent documents, and corresponding IRB approval back to NIH IRBO

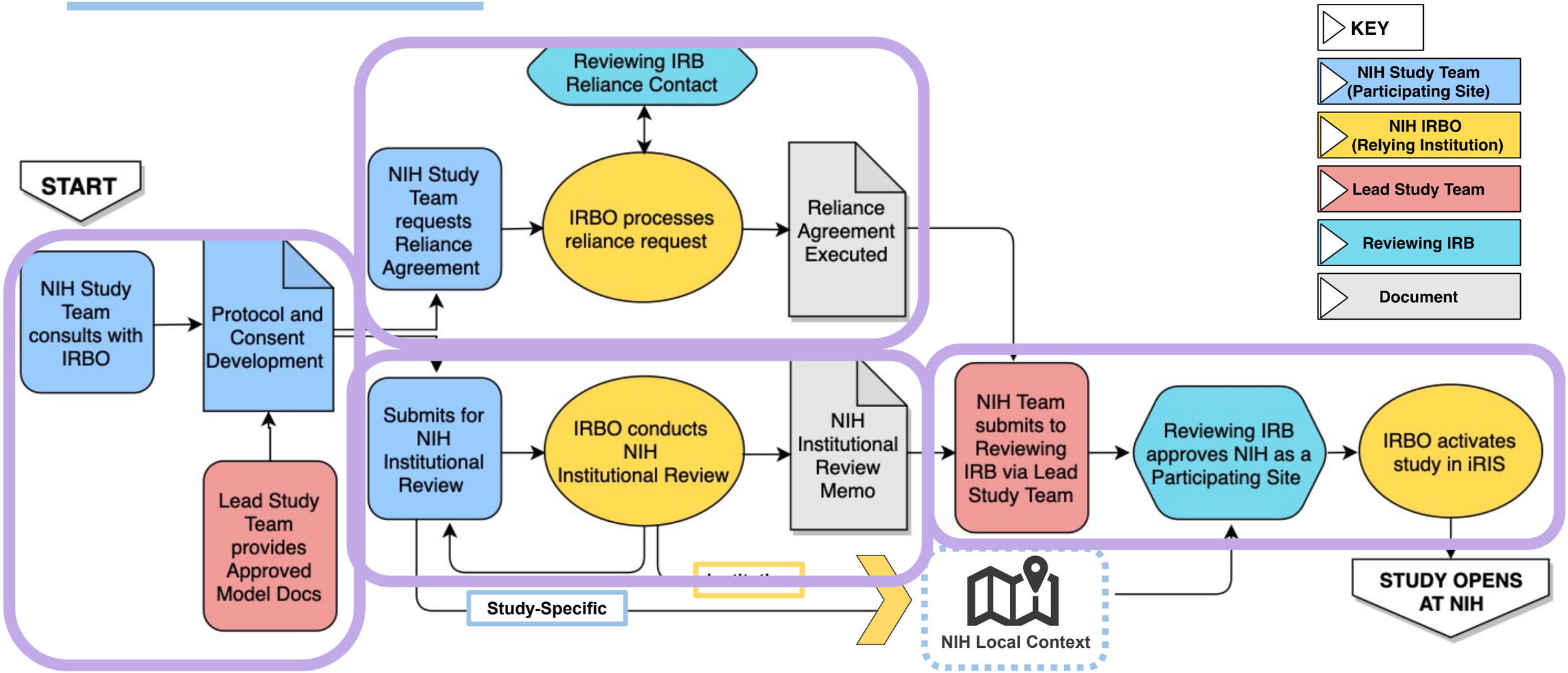
IRBO Activation Review

- NIH Study Team submits a “Response Review Submission Form” in response to the single stipulation issued at the time that the NIH Institutional Review Memo was issued
- Clean version of documents should be submitted unless the Reviewing IRB has made changes
- IRBO reviews the documents to ensure remain consistent with NIH institutional requirements
- Capture pertinent information that may not have been available at the outset e.g., risk determination for a specific population
- IRBO activates NIH Site in iRIS e.g., “Open – Recruiting”
- If at the NIH Clinical Center, documents forwarded to Office of Protocol Services (OPS) for administrative processing

OVERVIEW: NIH Study Team Relying on External Reviewing IRB



OVERVIEW: NIH Study Team Relying on External Reviewing IRB



Ongoing NIH Participating Site Study Team Responsibilities

- Maintain communication with the Lead Study Team
  - Ensures all current approvals from the IRB are in place
  - Mechanism to convey all protocol and consent changes, conflicts of interest updates, and local problem reports
- Comply with the requirements of the Reviewing IRB
  - Reporting requirements
  - Submitting Amendments and Continuing Reviews via their electronic system
- Responsible for managing all non-IRB requirements at the NIH for the duration of the study
  - Reporting events to OHSRP per Policy 801 via iRIS
  - Maintaining a shadow protocol

NIH HRPP/IRBO Ongoing Oversight

- Maintain a shadow review
  - Shadow Protocol with currently approved protocol and consent(s)/assent(s)
  - Require notification of reportable events that take place at the NIH Site
- Work with NIH study team to ensure all non-IRB requirements continue to be met and, if necessary, review further changes to site documents
  - New model consent is developed and that triggers the need to create NIH site
  - Protocol changes demand additional local context provision
- Assist with addressing problem events and instances of non-compliance
- Maintain communication with the Reviewing IRB

iRIS: NIH Study Team Relying on External Reviewing IRB

iRIS Considerations:

- Maintain Shadow Protocol
  - Currently approved protocol, consent and assent documents must be in iRIS
    - Consent/ assent must be IRB approved version (include OPS numbering if applicable)
  - Each study lifecycle action must be submitted, e.g. amendment, continuing review
    - No batch submissions
  - External IRB determination/approval letter must be included
    - Include site activation letter, if applicable
  - If External IRB does not approve research personnel, KSP changes are submitted to IRBO for review (note on amendment form that KSP changes are requested)
  - Close study via Progress Report Form

iRIS: NIH – Lead Site Study Team & Reviewing IRB

iRIS Considerations:

- Maintain accurate documentation for both the Lead Site and Participating Site(s)
- Study Application (SA):
  - Research Sites (section 6.0) - check Multiple Sites
  - Multiple Sites (section 7.0)
    - Indicate if NIH serves as the Coordinating Center (section 7.1);
      if no, list the Coordinating Center (section 7.2)
    - Check yes that non-NIH sites will use the NIH IRB to review research activities (section 7.3)
    - List each Participating Site (section 7.4)
      - This includes: Site Name; FWA number; Location information; Contact Information; and Mechanism for Review, which is Reliance Agreement (during Initial Review stage it will be 'seeking,' once Reliance Agreement is in place, the SA is updated to 'in place'

Takeaways: NIH - Lead Site Study Team & Reviewing IRB

- This presentation has outlined the *typical workflow* when the NIH serves as the Lead Study Team and the NIH IRB serves as the sIRB for a multi-site research protocol
- The reviewing IRB is responsible for the regulatory review;
  Local institutions are responsible for all other ancillary reviews
- During protocol development phase, the Lead Site Study Team should take into consideration the site capabilities and unique requirements to avoid unnecessary delays in study start-up
- The NIH Lead Study Team is the liaison between the NIH IRB and the Participating Sites
  - Communication is key
- IRBO is continuing to fine-tune the sIRB process to make it more efficient
- NIH Lead Site Study Team and IRBO should work together to facilitate the review process within and outside NIH

Takeaways: NIH Study Team Relying on External Reviewing IRB

- This presentation has outlined the *typical workflow* when relying on an external Reviewing IRB
- The sIRB review process can however vary significantly depending on the specific Reviewing IRB
- To be a successful Participating Site Team, the NIH Study Team needs to:
  - Become INFORMED about the sIRB Reviewing Process for the Reviewing IRB being used as well as the internal requirements at the NIH
  - Have clear channels of COMMUNICATION with all the Key Players
  - Be COLLEGIAL and FLEXIBLE, and
  - Be mindful of the varying PERSPECTIVES and RESPONSIBILITIES of the Key Players
- Together, these will help the NIH Study Team determine its responsibilities at each phase of the protocol lifecycle
- Important also to recognize that for each reliance arrangement, the NIH process needs to try to sync up with the Reviewing IRB processes – compatibility varies
- IRBO continues to evolve and refine its processes and requirements with each submission
- Study teams and IRBO need to work together to facilitate the review process within and outside NIH

Key Terms

TERM	DEFINITION
Ceded Review	When IRB review and oversight is transferred via a reliance agreement to another institution's IRB. "Relying Out" has the same meaning.
Engagement	An institution is engaged in human subjects research when its employees or agents either intervene or interact with living individuals for research purposes or obtain individually identifiable private information for research purposes.
Reliance Agreement	An agreement between institutions performing multi-site research that provides a mechanism to delegate IRB review, and that sets forth the authorities, roles, and responsibilities of the IRB and participating institutions. The agreement may apply to a single study or to certain categories of studies.
Participating Site	A research site involved in multi-site research.

Key Terms

TERM	DEFINITION
Lead Study Team	Designated by the Lead Principal Investigator (PI) and is generally located at the Reviewing IRB's institution. Main point of contact with the Reviewing IRB and facilitates communication pathways to and from Participating Sites to include IRB submissions to the Reviewing IRB.
Lead Principal Investigator	The Overall PI or multi-site PI has ultimate responsibility for the conduct and integrity of research. This PI is usually part of the Lead Study Team.
Relying Institution	An institution participating in multi-site research that cedes IRB review to an external reviewing IRB for human subjects research consistent with the terms of a reliance agreement.
Reviewing IRB	The IRB responsible for reviewing human subjects research and determining that the research meets the required criteria for approval under the regulatory requirements at 45 CFR 46 and, as applicable, the pertinent Subparts of 21 CFR parts 50. The IRB can also be referred to as the single IRB, IRB of record or central IRB.

Helpful Links

Final NIH Policy on the Use of a Single Institutional Review Board for Multi-Site Research

Revised Common Rule, 2018 Requirements, 45 CFR 46

OHRP Guidance Engagement of Institutions in Human Subjects Research (2008)

NIH IRBO Website

IRBO Reliance Resources

Questions?

Submit via NIH Videocast website

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