WORKING WITH CENTRAL IRBS

A step-by-step review of the process

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Discussion Points

- Introduction
- Why use a central IRB?
- History of central IRB utilization at UNC
- What you need to know about UNC Central IRB service agreements
- Step-by-step process
- Who to contact for help

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Talking the talk

- Central IRB = Independent IRB = Commercial IRB = For-profit IRB
- Rely on = Defer to = Cede to
- Permission to Register = Permission to submit to Central IRB
- Approval = Approval from Central IRB
- Final Reliance = UNC acknowledgement to fully rely-on Central IRB for oversight
  - Investigators **must** have **final reliance** from **UNC IRB** to start study activities

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Why use a Central IRB?

- National effort to utilize a central IRB since 2006
- Reduce time to approval
- Reduce staff effort
- Streamlining across multiple sites
- Reduce duplicative efforts
- Sponsor request/requirement

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Approved Central IRBs

- Chesapeake
- Quorum
- Schulman
- Sterling
- Copernicus Group
- Western (WIRB)

} WIRB–Copernicus Group (WCG)

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Research that qualifies…

UNC allows investigators to utilize a Central IRB when…

- The research is an industry-sponsored, multi-center, clinical research study
- One of the UNC-approved Central IRBs has been appointed as the *Central IRB of Record* by the Sponsor or CRO
- The study has been approved (or is in the process of being approved) by the Central IRB

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Research that qualifies…

The IRB **may allow** the use of a Central IRB in other situations.
The use of a Central IRB is **optional.**

Research that does not qualify

This is NOT a mechanism to involve a commercial IRB in "homegrown" single site studies in which the central IRB is not already involved.

- These will remain under UNC IRB oversight

Background…

- The Office of Human Research Ethics/IRB conducted a pilot study from June to December 2012 to assess the feasibility and acceptability of reliance on central IRBs
- Utilized 20 eligible Central IRBs (AAHRPP accredited; in good standing with FDA and OHRP.)

Background…

- Randomized 43 multicenter, industry studies were randomized into one of two groups:
  - Control – Remained under the oversight of UNC IRB. Reviewed in the usual manner.
  - Experimental – IRB oversight ceded to Central IRB UNC IRB (sham) review served as an internal quality control measure.
  - UNC investigators, IRB members and staff were all blinded to group assignment

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Background…

What did we learn from the pilot project?

- Approximately 1/3 of initial reviews by convened biomedical IRB are potentially eligible for outsourcing.
- Of the 20 approved central IRB's, only 8 were utilized
- Potential time-savings of ~20 days/study

Background…

- No quality issues identified; UNC IRB contingencies were administrative in nature
- Problems encountered were related to:
  - Consent form language (injury, COI)
  - Navigating the registration process
  - Miscommunications with CRO

From Pilot Project to Policy

June-December 2012-Pilot Project

October 2013- Institutional policy permitting reliance on 13 Central IRBs

October 2014- Revision of institutional policy limiting reliance to 6 Central IRBs.

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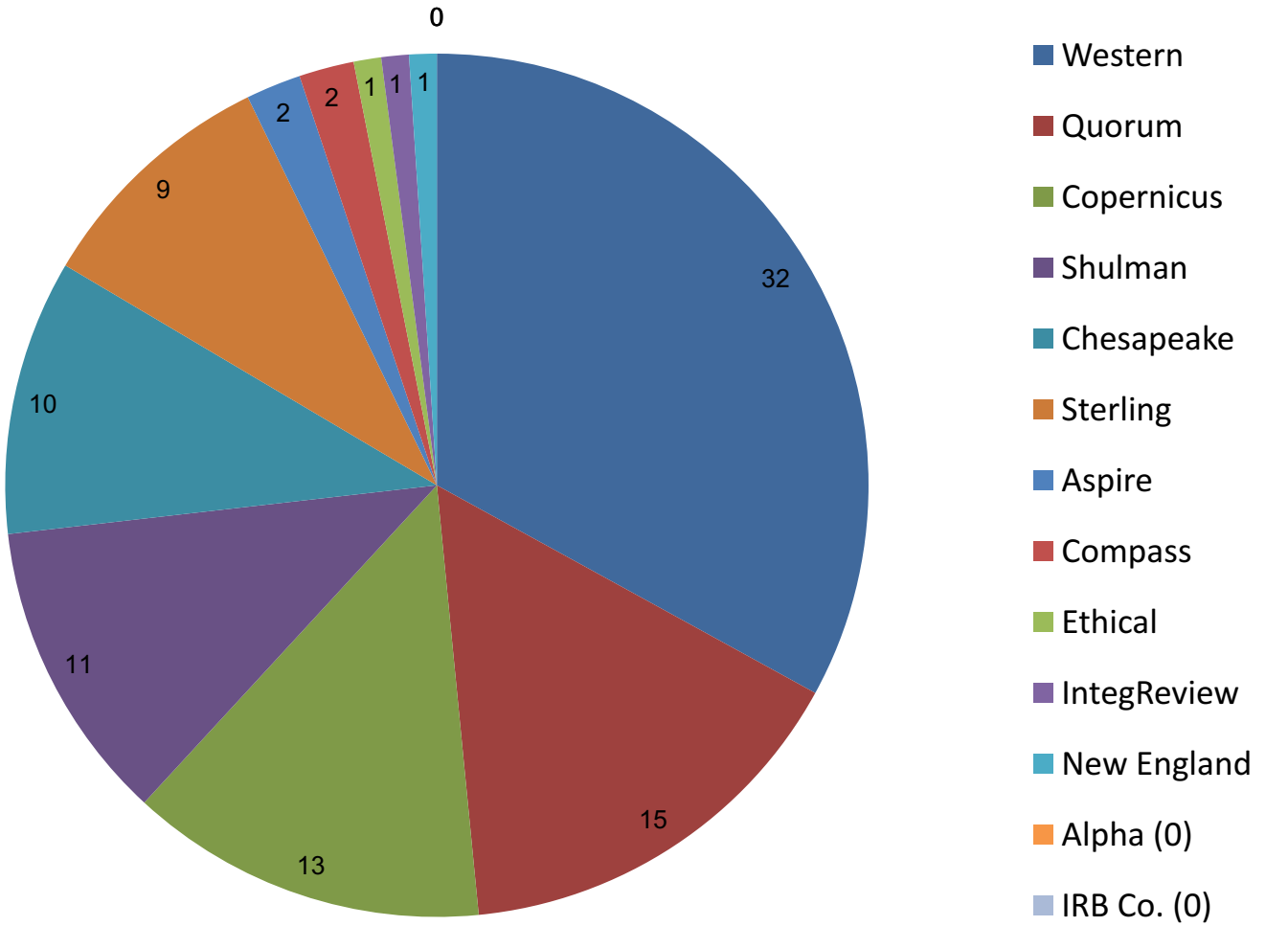
Year 1 (October 2013-2014) Data for All Central IRBs with MSA in Place



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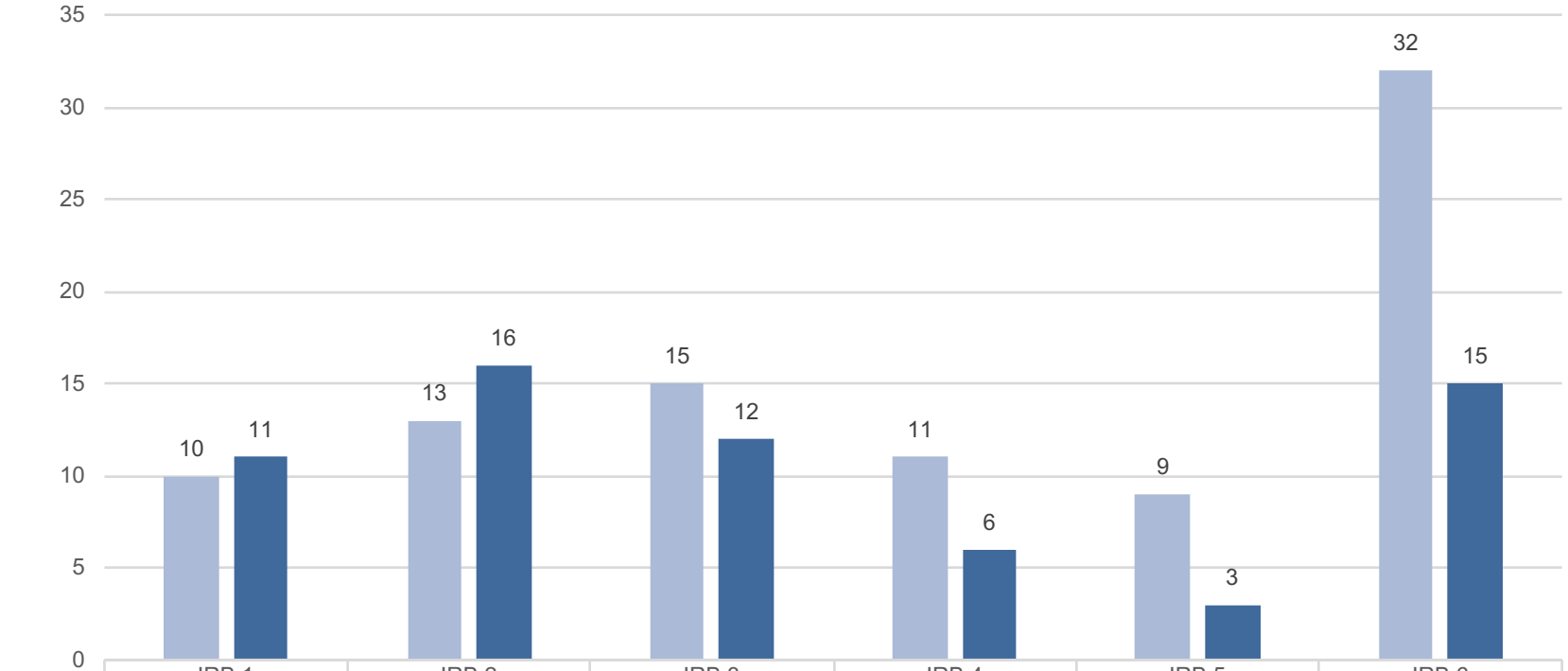
I-IRB Utilization Data
Years 1 (October 2013-2014) & 2 (October 2014-2015)



	IRB 1	IRB 2	IRB 3	IRB 4	IRB 5	IRB 6
Year 1	10	13	15	11	9	32
Year 2	11	16	12	6	3	15

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Master Service Agreements with Central-IRBs

"Institution shall assure that the Clinical Trials Agreement (CTA), if any, and the approved consent form do not conflict with each other regarding compensation for injury."

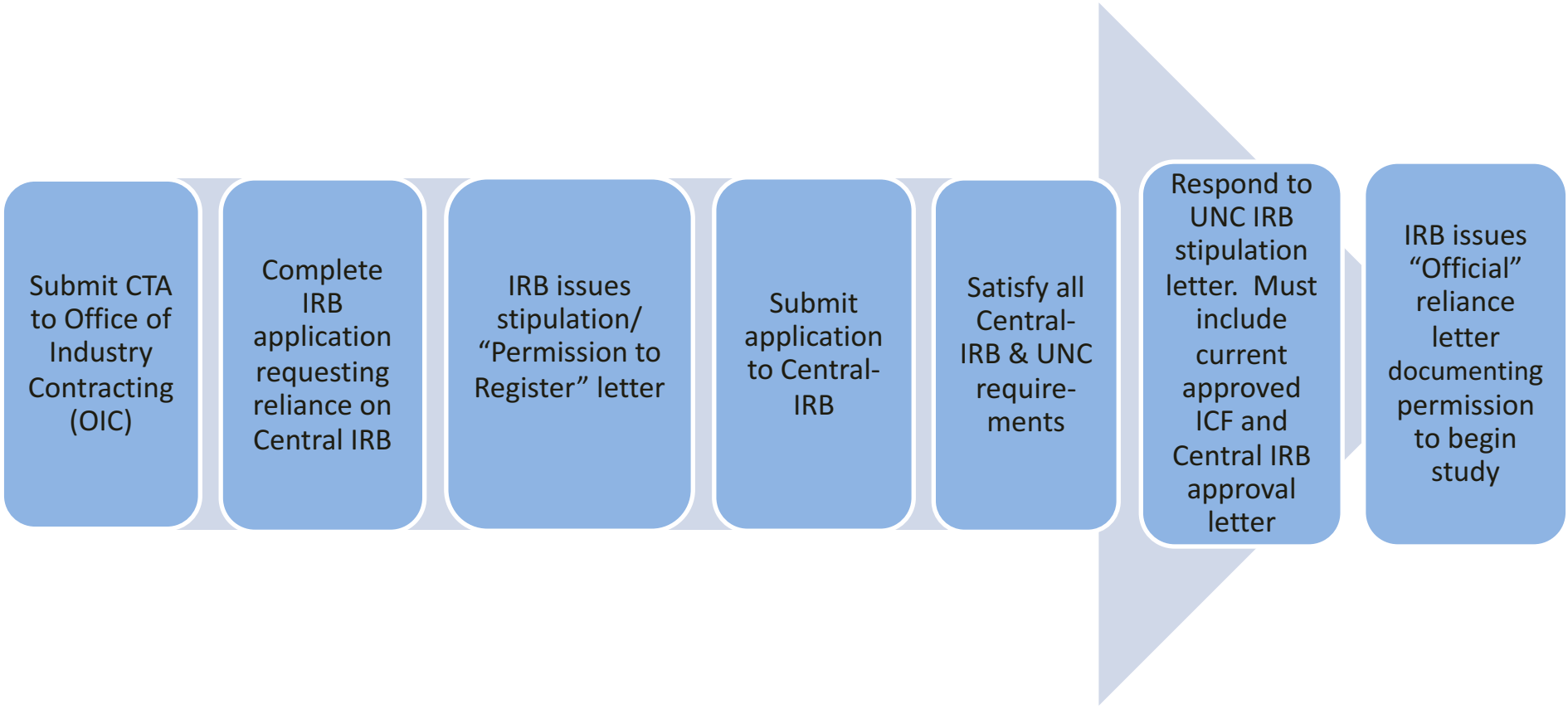
"Institution shall provide to IRB subject injury language and conflict of interest language to be included in the informed consent form(s) for each study. IRB shall not change Institution's subject language or conflict of interest language without the express written permission of the Institution."

- Issues related to subject injury language should be provided to the Office of Industry Contracting (OIC).
- Issues related to conflict of interest language should be directed to the Conflict of Interest Office (COI).

Master Service Agreements with Central-IRBs

"IRB agrees to defer to Institution's IRB for any HIPAA related analysis and to use Institution's HIPAA Authorization form as an addendum to the informed consent form."

Workflow


Submit CTA to Office of Industry Contracting (OIC)
Complete IRB application requesting reliance on Central IRB
IRB issues stipulation/ "Permission to Register" letter
Submit application to Central-IRB
Satisfy all Central-IRB & UNC require-ments
Respond to UNC IRB stipulation letter. Must include current approved ICF and Central IRB approval letter
IRB issues "Official" reliance letter documenting permission to begin study

Submission Process – Office of Industry Contracting

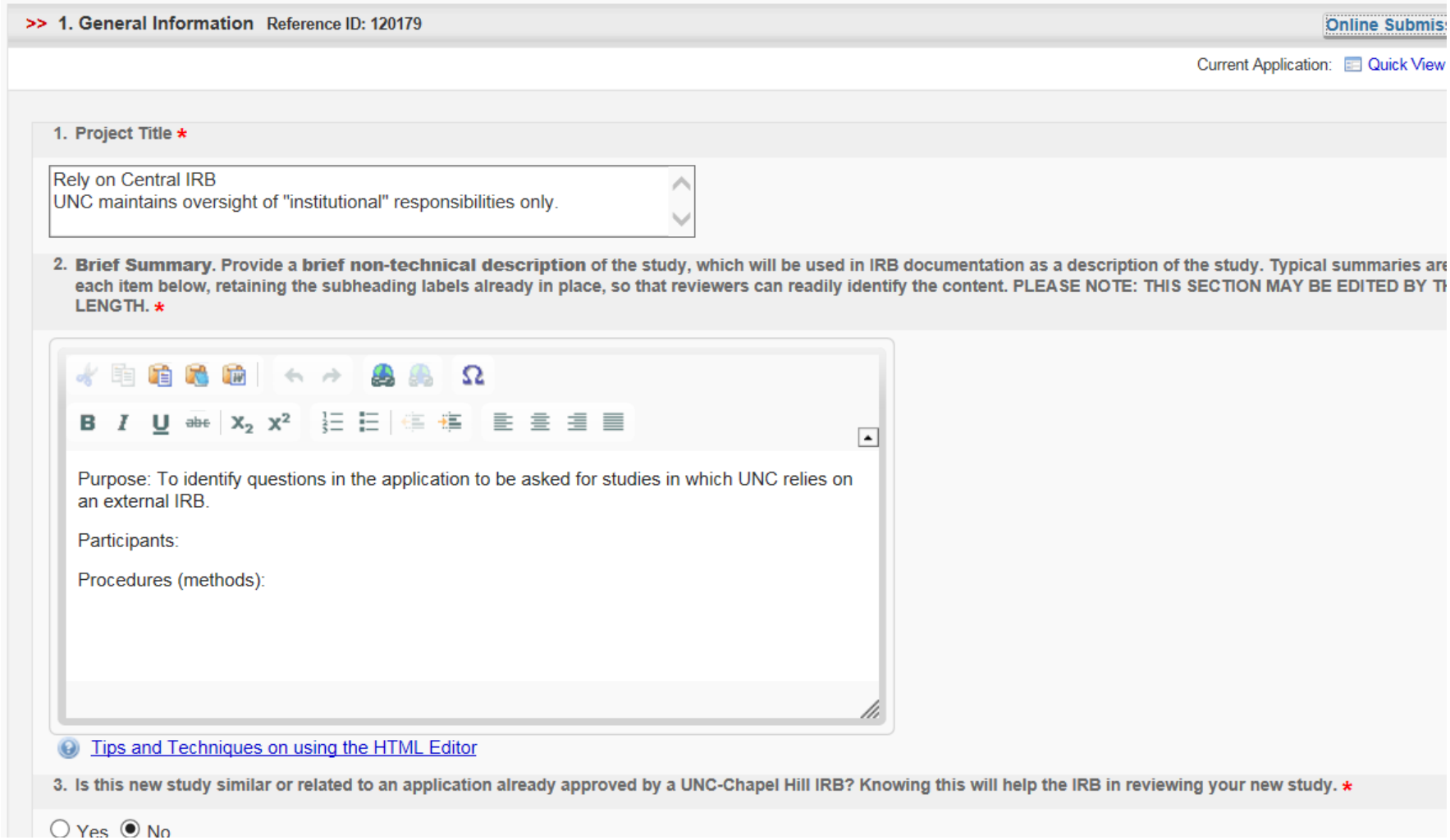
- Step 1: Submit the Clinical Trials Agreement (CTA), model consent form and current version of the protocol to the Office of Industry Contracting (OIC) prior to submitting your study in IRBIS.

The OIC Contract Manager needs to ensure that the subject injury language in the Sponsor/CRO-provided draft consent form is consistent with the language in the Clinical Trial Agreement (CTA).

Submission Process – IRB

- Step 2: Complete *Abbreviated* IRB application requesting reliance on Central IRB

Section	Questions	Purpose Served
General Info	Personnel, Sponsor, Multisite?	COI, training, REQUEST RELIANCE ON CENTRAL IRB
A.4.A.2	Biomedical- drugs, devices?	IDS
A.4.A.3	Stem cells, clinical labs, radiation, gene transfer?	ESCRO, UNC-HCS, RSC, IBC
A.9	Identifiers?	Data security
A.10	Confidentiality, sensitivity?	Data security
B.2	Protected Health Info (PHI)?	HIPAA waiver or authorization
B.4	Collecting SSN for payments?	SSN collection form
C.4	Sources of data?	Data security


>> 1. General Information Reference ID: 120179
Online Submis
Current Application: Quick View
1. Project Title *
Rely on Central IRB
UNC maintains oversight of "institutional" responsibilities only.
2. Brief Summary. Provide a brief non-technical description of the study, which will be used in IRB documentation as a description of the study. Typical summaries are
each item below, retaining the subheading labels already in place, so that reviewers can readily identify the content. PLEASE NOTE: THIS SECTION MAY BE EDITED BY TH
LENGTH. *
Purpose: To identify questions in the application to be asked for studies in which UNC relies on an external IRB.
Participants:
Procedures (methods):
Tips and Techniques on using the HTML Editor
3. Is this new study similar or related to an application already approved by a UNC-Chapel Hill IRB? Knowing this will help the IRB in reviewing your new study. *
Yes
No

>> **3. Funding Sources** Reference ID: 120179

1. Is this project funded (or proposed to be funded) by a contract or grant from an organization EXTERNAL to UNC-Chapel Hill? *

(•) Yes ( ) No

Is UNC-CH the direct recipient of any Federal funding for this study? *

( ) Yes (•) No

Funding Source(s) and/or Sponsor(s)

Click here to add funding source and/or sponsor

Information currently not available

2. Is this study funded by UNC-CH (e.g., department funds, internal pilot grants, trust accounts)? *

( ) Yes (•) No

3. Is this research classified (e.g. requires governmental security clearance)? *

( ) Yes (•) No

4. Is there a master protocol, grant application, or other proposal supporting this submission (check all that apply)?

☐ Grant Application

☑ Industry/Federal Sponsor Master Protocol

Required document(s): Master Protocol

CURRENT PROGRAMMING CANNOT SUPPRESS "REQUIRED DOCUMENT". RESPOND "N/A" IN ATTACHMENT SECTION.

>> 4. Screening Questions Reference ID: 120179

Online Submission FAQ | Online Submission Gui

Current Application: Quick View (HTML) | PDF | Delete Submis

The following questions will help you determine if your project will require IRB review and approval.

The first question is whether this is RESEARCH (click for details)

1. Does your project involve a systematic investigation, including research development, testing and evaluation, which is designed to develop or contribute to generalizable knowledge? PLEASE NOTE: You should only answer yes if your activity meets all the above. * (●) Yes ( ) No

The next questions will determine if there are HUMAN SUBJECTS (click for details)

2. Will you be obtaining information about a living individual through direct intervention or interaction with that individual? This would include any contact with people using questionnaires/surveys, interviews, focus groups, observations, treatment interventions, etc. PLEASE NOTE: Merely obtaining information FROM an individual does not mean you should answer 'Yes,' unless the information is also ABOUT them. * (●) Yes ( ) No

3. Will you be obtaining identifiable private information about a living individual collected through means other than direct interaction? This would include data, records or biological specimens that are currently existing or will be collected in the future for purposes other than this proposed research (e.g., medical records, ongoing collection of specimens for a tissue repository). * (●) Yes ( ) No

CLICK TO REVIEW RELIANCE GUIDANCE DOCUMENT

The following questions will help build the remainder of your application.

4. Will subjects be studied in the Clinical and Translational Research Center (CTRC, previously known as the GCRC) or is the CTRC involved in any other way with the study? (If yes, this application will be reviewed by the CTRC and additional data will be collected.) * ( ) Yes (●) No

5. Does this study directly recruit participants through the UNC Health Care clinical settings for cancer patients or does this study have a focus on cancer or a focus on a risk factor for cancer (e.g. increased physical activity to reduce colon cancer incidence) or does this study receive funding from a cancer agency, foundation, or other cancer related group? (If yes, this application may require additional review by the Oncology Protocol Review Committee.) * ( ) Yes (●) No

6. Are any personnel, organizations, entities, facilities or locations in addition to UNC-Chapel Hill involved in this research (e.g., is this a multi-site study or does it otherwise involve locations outside UNC-CH, including foreign locations)? You should also click "Yes" if you are requesting reliance on an external IRB, or that UNC's IRB cover another site or individual. See guidance. * (●) Yes ( ) No

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>> 5. Multi-site Study Information Reference ID: 120179 Online Submission FAQ Online Submission Guide

Current Application: Quick View (HTML) PDF Delete Submission

1. Will this study be conducted in locations outside the United States? *

○ Yes ◉ No

2. Is UNC-CH the lead site or is the lead PI a UNC-CH employee? *

○ Yes ◉ No

3. Is UNC-CH taking or being asked to take responsibility for the oversight of research by individuals, groups or organizations outside of UNC-CH? *

○ Yes ◉ No

Are you requesting that UNC-CH rely on an external IRB for continuing review and approval of this study?

◉ Yes ○ No

Required document(s): External IRB Approval Letter

Researchers are reminded that additional approvals may be needed from relevant "gatekeepers" to access subject.

NEW ADDITION TO IRBIS APPLICATION WHEN REQUESTING RELIANCE ON ANY EXTERNAL IRB

Please be aware that reliance on an external IRB obligates you to review and adhere to the reviewing IRB's Human Research Protection Program (HRPP) policies (i.e., SOPs) so that you understand your responsibilities as an Investigator. To obtain a copy of the external institution's policies, contact your collaborator/colleague or the external IRB directly. I you have questions about the policies, you should contact the external IRB directly.

☐ I agree to obtain and review the external IRB's policies PRIOR to conducting research

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1. **Select External IRB:** *

- ○ National Cancer Institute Central IRB (NCI CIRB)
- ◉ Independent/Central IRB already designated for this study by Sponsor/CRO
- ○ Institutional IRB (e.g., another university)

If you are planning to use a central IRB please submit your CTA to OCT at your earliest convenience. By doing so, the OCT Contract Manager assigned to your study can help to ensure acceptable subject injury language is negotiated in the contract and consent form.

Select one: *

- Chesapeake IRB
- Copernicus Group IRB
- Quorum Review IRB
- Schulman Associates IRB
- Sterling IRB
- Western IRB
- Other

* Required.

ess continue or any link in the Item List to your left.

Save and Stay Save and Continue

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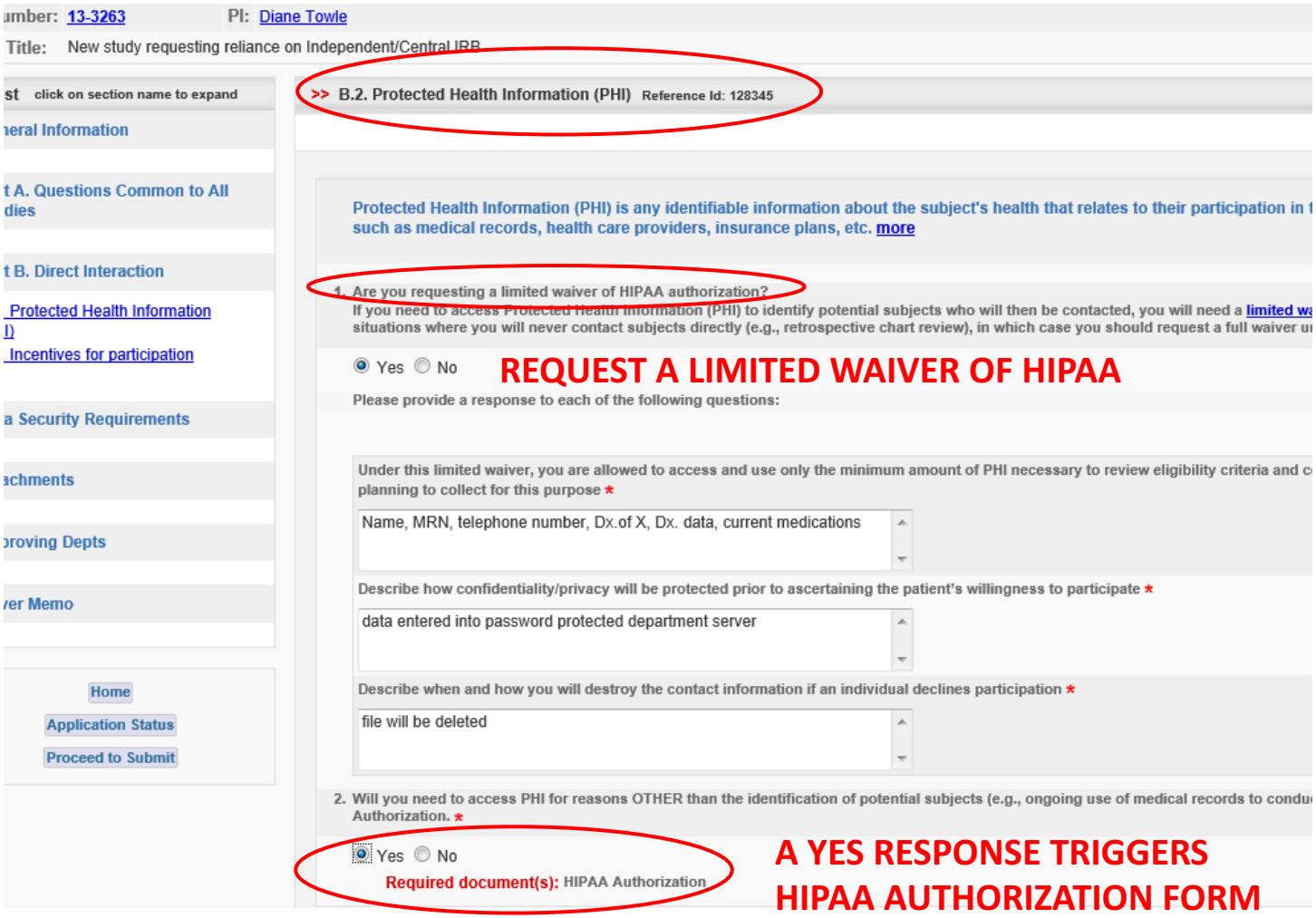

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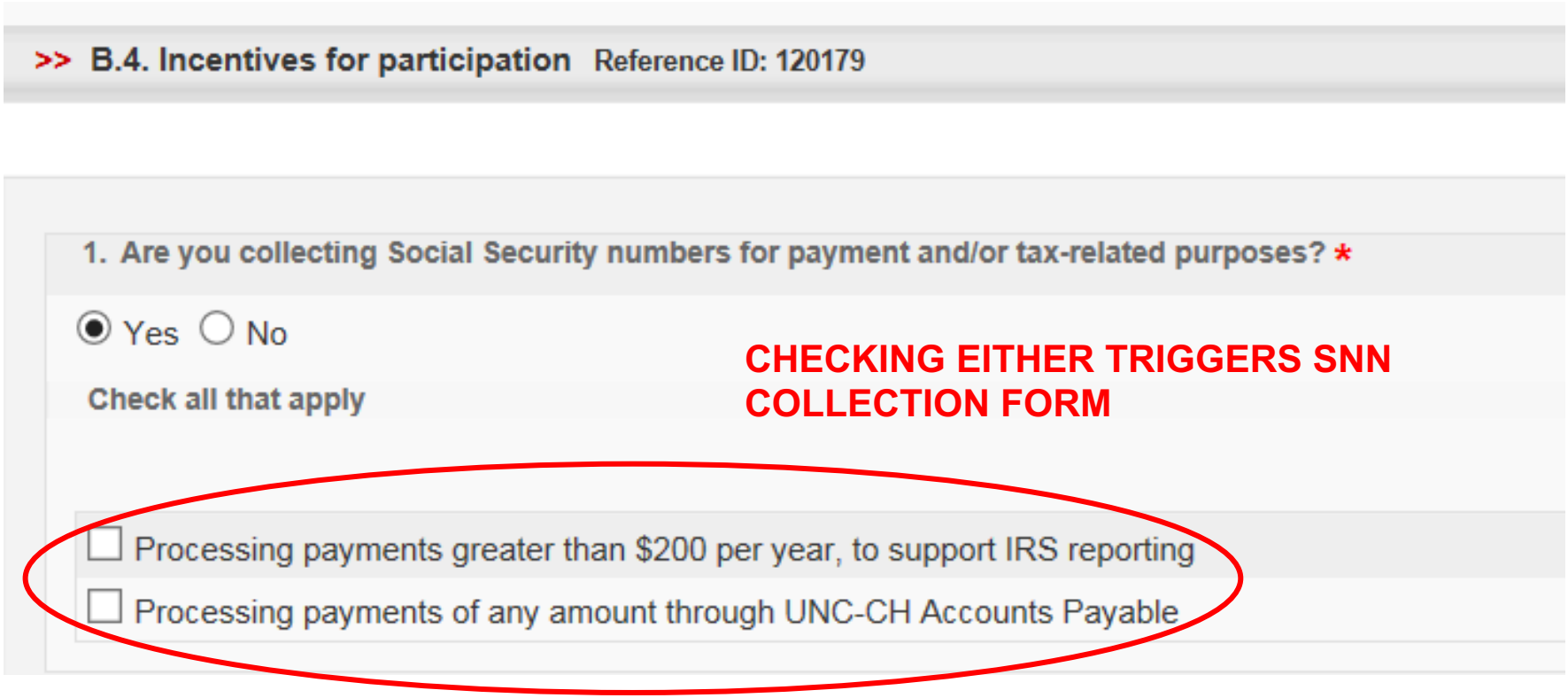

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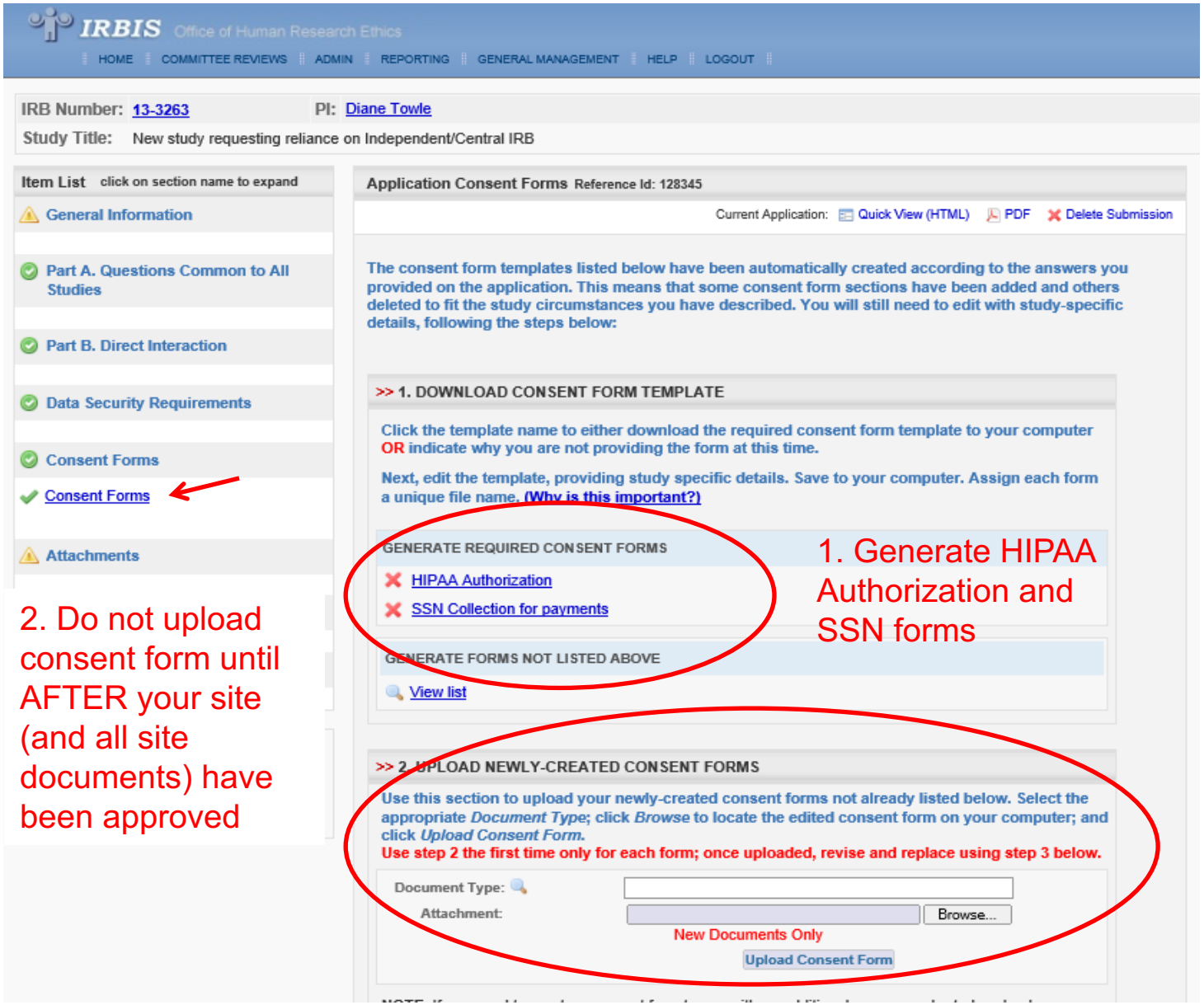
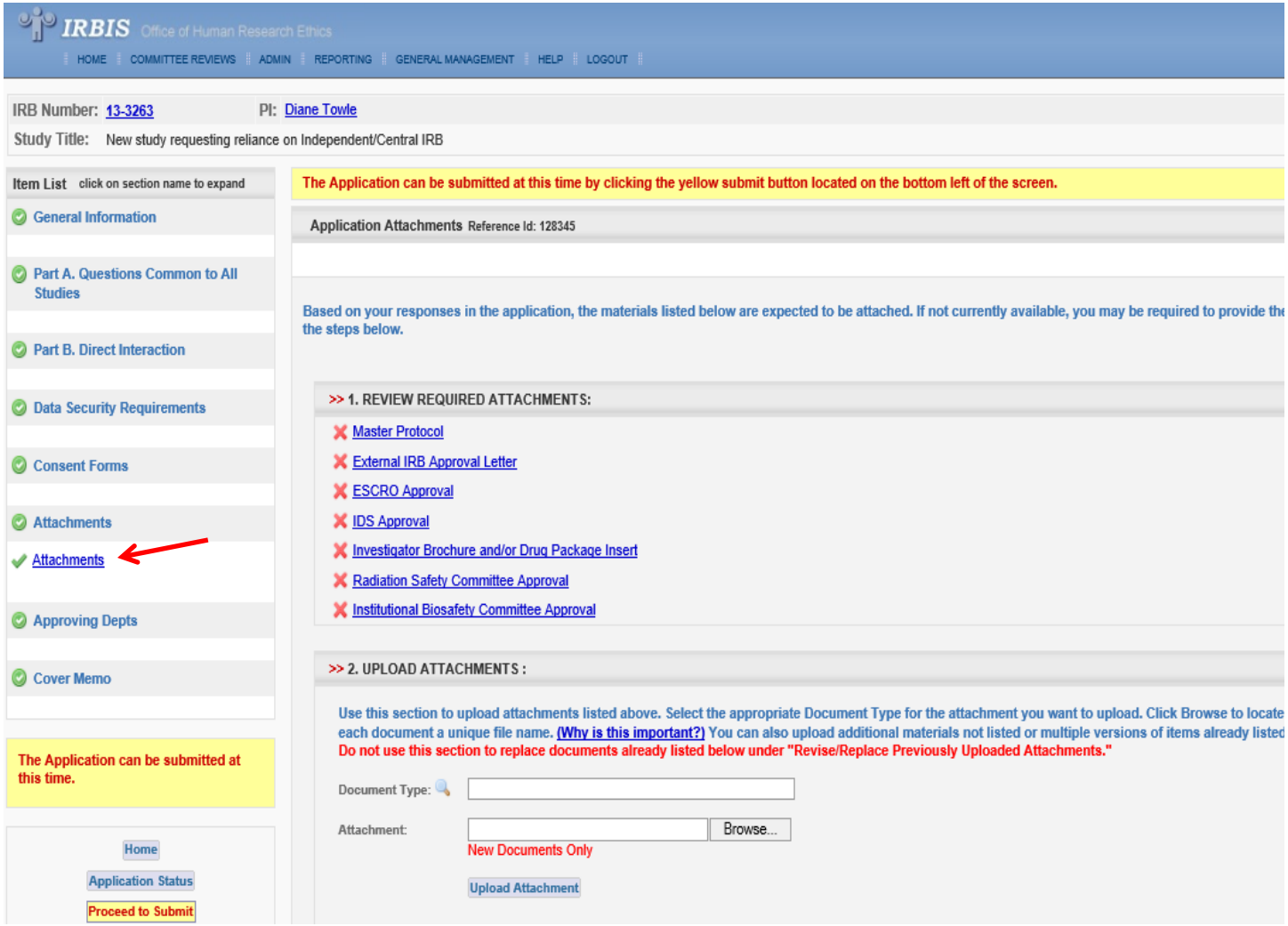

IRBIS Office of Human Research Ethics
HOME COMMITTEE REVIEWS ADMIN REPORTING GENERAL MANAGEMENT HELP LOGOUT
IRB Number: 13-3263 PI: Diane Towle
Study Title: New study requesting reliance on Independent/Central IRB
Item List click on section name to expand
General Information
Part A. Questions Common to All Studies
Part B. Direct Interaction
Data Security Requirements
Consent Forms
Consent Forms
Attachments
Application Consent Forms Reference Id: 128345
Current Application: Quick View (HTML) PDF Delete Submission
The consent form templates listed below have been automatically created according to the answers you provided on the application. This means that some consent form sections have been added and others deleted to fit the study circumstances you have described. You will still need to edit with study-specific details, following the steps below:
>> 1. DOWNLOAD CONSENT FORM TEMPLATE
Click the template name to either download the required consent form template to your computer OR indicate why you are not providing the form at this time.
Next, edit the template, providing study specific details. Save to your computer. Assign each form a unique file name. (Why is this important?)
GENERATE REQUIRED CONSENT FORMS
HIPAA Authorization
SSN Collection for payments
GENERATE FORMS NOT LISTED ABOVE
View list
>> 2. UPLOAD NEWLY-CREATED CONSENT FORMS
Use this section to upload your newly-created consent forms not already listed below. Select the appropriate Document Type; click Browse to locate the edited consent form on your computer; and click Upload Consent Form.
Use step 2 the first time only for each form; once uploaded, revise and replace using step 3 below.
Document Type:
Attachment:
Browse...
New Documents Only
Upload Consent Form
1. Generate HIPAA Authorization and SSN forms
2. Do not upload consent form until AFTER your site (and all site documents) have been approved



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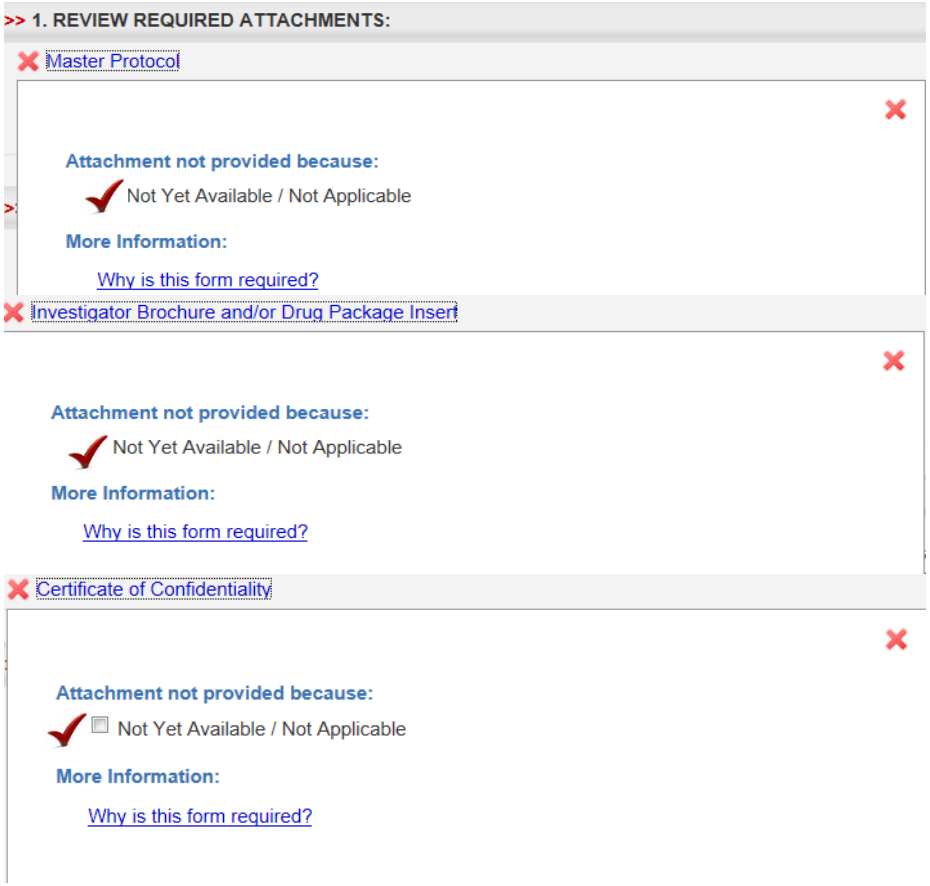
EXCEPTIONS: You may check "Not Yet Available/Not Applicable" for Master Protocol, Investigator Brochure, Certificate of Confidentiality



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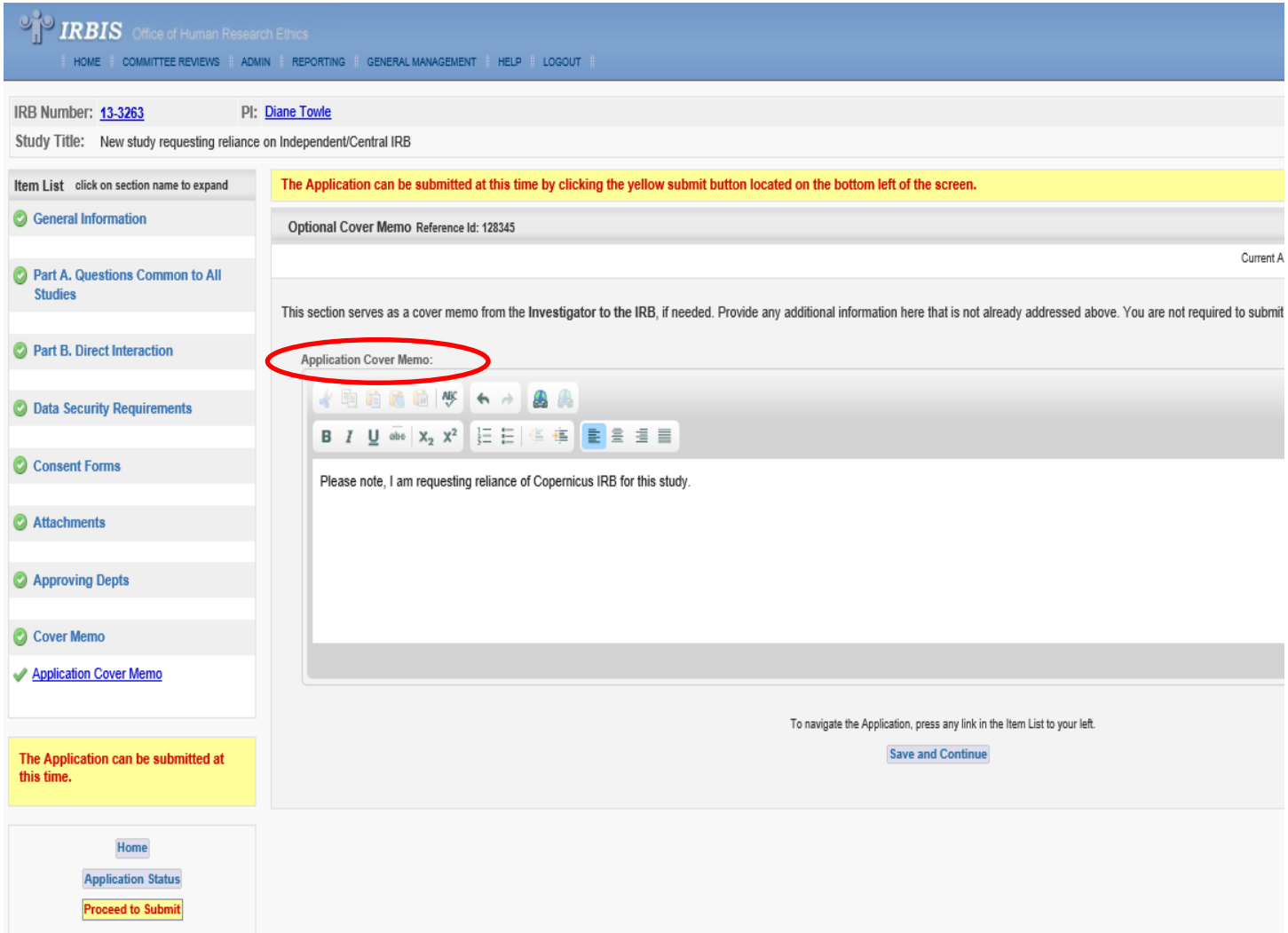

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Submission Process

- Step 3: Following a review of your application, the IRB will email you a *Permission to Register* letter. Follow the instructions outlined in the letter:
  - Complete COI process for all members
  - Submit to OIC if you have not already
  - Modify Sponsor's model consent form and move HIPAA language into separate form
  - Submit to the Central IRB

Submission Process

- Step 4: Following notification of Central-IRB approval, Investigator re-submits application to UNC IRB for '*Final-Reliance*'
  - Respond to any outstanding UNC IRB contingencies
  - Finalize process with UNC IRB:
    - Submit final approved consent form,
    - Central IRB approval letter and
    - Confirmation email from OIC

Submission Process

- Step 5: The IRB will review your responses and if no outstanding institutional requirements have been identified and COI and injury language are acceptable, the UNC IRB will email you an “official” reliance letter, permitting research to begin.

If applicable, the UNC IRB will grant a limited waiver of HIPAA. A limited waiver of HIPAA allows you to review medical records for the purpose of identifying and contacting potential eligible subjects.

References:

- Using a Centralized IRB Review Process in Multicenter Clinical Trials http://www.fda.gov/RegulatoryInformation/Guidances/ucm127004.htm
- The Paradoxical Problem with Multiple-IRB Review, Menikoff, J, N Engl J Med 2010; 363;17, October 21, 2010
- IRB Guidance Document: How to Request Reliance on an External IRB https://research.unc.edu/files/2016/02/How-to-Request-a-Reliance-Agreement-2016-03-01.pdf

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