RESEARCH AND SCHOLARSHIP
HUMAN SUBJECTS
RESEARCH OFFICE
MIAMI

Using External IRB

New Submission Process

Doralis “Dori” Bugallo, BGS
IRB Analyst, Reliance Review

Evelyne Bital, MA, CIP
Associate Director, Regulatory Affairs and Reliance Review


THE NIT-PICKING IRB
NITS
NITS
NITS
NIT
Don Mayne

Objectives

- Commonly Used Terms
- Define Roles When UM Relies on External IRB
- Define the Process of Requesting Reliance on External IRB
- Describe how to Complete the IBIS Submission
- Tips for IRB Submission

Terms You Might Hear

Single IRB Review (Central IRB) – One IRB that provides regulatory and ethical review for multiple sites that are engaged in human subject research.

- A Central IRB may be independent (sometimes called commercial) or institutional

Reviewing IRB – The IRB that reviews and makes required regulatory determinations (IRB of Record)

Relying Institution – External institution that cedes IRB responsibilities to the Reviewing IRB

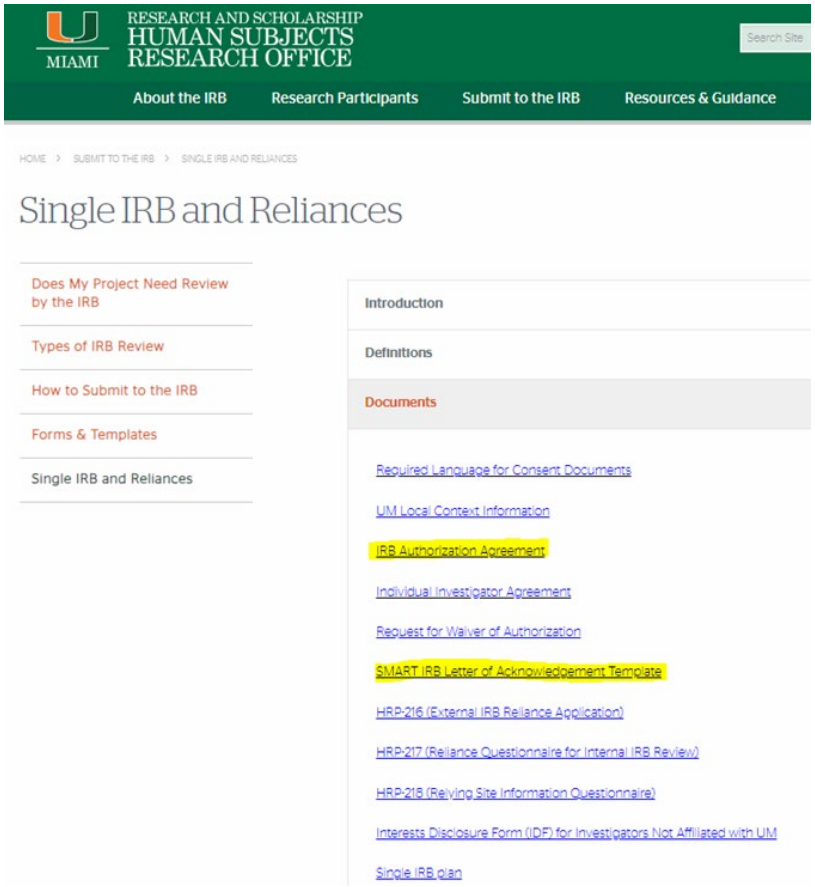
Local Context – Information about the location and the institution where the research will be conducted, including local law and institutional policies governing human subject research, demographic information about the local community.

Institutionally Required Local Language – The Language required by UM to be present in the informed consent document.

Institutional Authorization Agreement (IAA)– an agreement that outlines the responsibilities of each party.

Terms you Might Hear

- **IRB Authorization Agreement (IAA):** A written agreement that outlines the responsibilities of each party when using reliance.
  - Referred to as Reliance Agreement, Master IRB Agreement (i.e. Advarra, WCG, NCI).
  - SMART IRB Agreement – A platform and accompanying Reliance Agreement including reliance terms which have been universally agreed upon by all Participating Institutions and provides IRB oversight among collaborating institutions.
    - SMART IRB is Not a review board.
    - Streamlined process for ceding or accepting reliance
    - UM is a participant of SMART IRB platform.
    - When possible, use of SMART IRB is preferable. (Online portal or Letter of Agreement, LOA)
  - IREx: Another platform developed to facilitate initiation of multi-site research and documents management.



Reviewing vs. Relying IRB Responsibilities

ROLES

External IRB

- ❑ Regulatory oversight of human subject research.
  - **Initial review**
    - Local context information
    - Possibly HIPAA determination
  - Continuing reports
  - Modifications
  - Reportable events

RELYING SITE (UM) / STUDY TEAM

- ❑ Submit initial study in IBIS including request for external IRB review.
- ❑ Submit to external IRB according to that IRBs requirement, including:
  - ❑ Signed HRP-216
  - ❑ Any document and information required by that IRB
- ❑ Submit external IRB determination to HSRO including:
  - Informed consent
  - Site related documents
- ❑ Submit CR, MODs and RNIs to external IRB.

UM external IRB model (when we cede IRB review to an external IRB)

Eligibility Criteria

- ❑ Federally-funded and external review is required per single IRB mandate.
- ❑ Industry funded, non-exempt multi-site study and the sponsor is requiring the UM to rely on an external IRB as a condition of participation**. Sponsor must provide a statement requiring external IRB review.**
- ❑ Legacy arrangements where UM IRB already agreed to cede review.
- ❑ Other extenuating circumstances considered on a case-by-case basis. The complexity of the protocol will factor into this decision.

The University of Miami reserves the right to determine if external IRB for specific project is appropriate for the institution.

UM external IRB model (when we cede IRB review to an external IRB)

Eligibility Criteria- Industry funded studies

- ❑ All industry-sponsored initial submissions in IRB must be submitted simultaneously with the IBIS Funding Proposal (FP). A linked FP must be reflected under the “Related Projects” tab in IBIS.
- ❑ The link below will give you access to the "Manage Relationships Activity - Job Aid Tip Sheet" for more information:

https://miami.app.box.com/s/w248pscle400tx3j8kzpi1tqy70iyfwl

It's important to note that submissions will be withdrawn until the related project to the FP (Funding Proposal) is linked by executing “Manage Relationships” (Option can be located on the left-hand side of the study workspace) and the FP is submitted to the ORA.

UM external IRB model (when we cede IRB review to an external IRB)

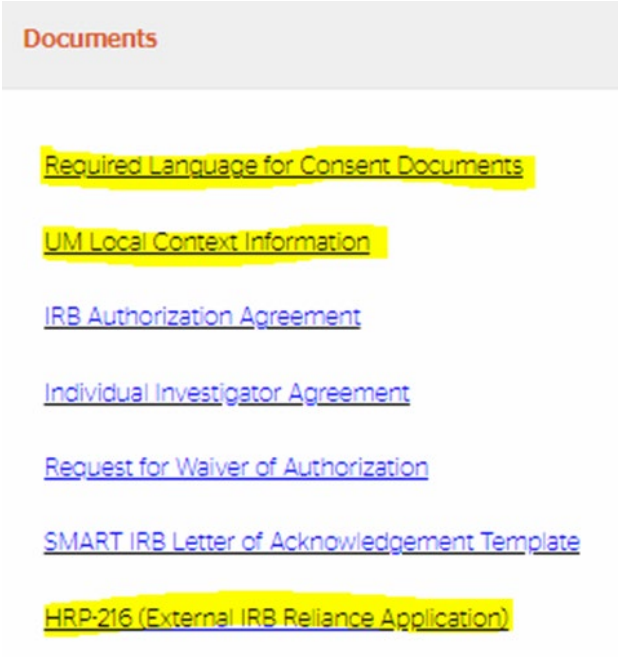
Eligibility Criteria- Industry funded studies

- ❑ All new industry-sponsored clinical research studies, must be reviewed for feasibility by the Miller School of Medicine (MSOM) Research Feasibility Committee (RFC) prior to IRB submission.
- ❑ If approval from the RFC has been obtained, please upload the approval in IBIS.
- ❑ If not, submission will need to be withdrawn until approval is granted. To obtain approval please visit the link that follows:

http://miamictsi.org/researchers/feasibility

UM external IRB model (when we cede IRB review to an external IRB)

- Administrative review by the HSRO
  - HRP-216 Reliance Application
  - Rely on External IRB (Sign agreements)
  - Carry on administrative review functions
    - Approval notice from the external site
    - Ensure that UM consent documents include UM-specific language
    - Provide UM's local context information when requested, including state and local laws



- Ancillary Reviews

Completed HRP-216 application - Upload in IBIS

I. Basic information
II. Statement of justification

Statement of Justification for use of external IRB:

* Study is PHS-funded and external review is required per single IRB mandate
* Industry-funded multi-site study and sponsor is requiring single IRB review ***as a condition*** of participation. – **Provide a statement from sponsor requiring external single IRB review**.
* Investigator-Initiated study where UM is a site – Must provide compelling argument for using an external IRB.
* Other:

III. Sponsor / Funding Source
IV. External IRB information
V. Role of UM
VI. Local context information – UM required language (as applicable)
VII. HSRO Sign-off

Steps to Submit New External IRB Studies in IBIS

1. Access IBIS
2. **Create a study**

All NEW External IRB studies must be submitted as MultiSite Studies in IBIS

Basic Study Information Page – to capture study-wide information. (documents uploaded on this page do NOT get finalized and may not be visible on Velos D-Link)

3. **Questions 1-3:** Under Basic Study Information, enter the Title of the Study, Short Title and a Brief Description.
4. **Question #4:** What kind of study is this?
   Select: "Multi-site or Collaborative study
5. **Question #5**: Will an IRB other than the UM act as the IRB of record for this study at the UM site?
   Select: "Yes"
6. **Question #6**: Lead principal investigator
   If you know the name of the overall investigator you may enter it here, otherwise, leave this question blank.
7. **Question 7:** Local principal investigator
9. **Question 8**: Attach the protocol to be finalized – The protocol will go to Velos D-Link

Example

Basic Study Information

1. * **Title of study:**
   Test-Mabel

2. * **Short title:**
   Testing

3. * **Brief description:**
   Testing external submission

4. * **What kind of study is this?**
   Multi-site or Collaborative study

5. * **Will an IRB other than the University of Miami act as the IRB of record for this study at the UM Site?**
   (●) **Yes** ( ) No

6. **Lead principal investigator:**

7. * **Local principal investigator:**
   UMTest Princ Investigator (pi)

Basic Local Site Information – to capture UM General Information

Question 1: Brief description of activities this site will perform
Describe the activities your site will perform for this study. For example, if your site will perform all study procedures, you can enter, “All study procedures.” If your site will perform only a few procedures such as analysis of identifiable data, enter “Analysis of identifiable data.”

Example

Basic Local Site Information

1. * **Brief description of activities this site will perform:** (enter "ALL" if this site will perform all procedures in the protocol)
   All procedures

2. **Attach the protocol:**

	Document	Category	Date Modified	Document History
View	UM ICF language_single-irb-and-reliances.pdf(0.01)	IRB Protocol	10/28/2019	History

External IRB – To capture information on the external IRB

Question 1: External IRB
Select the external IRB from the drop-down menu
If not available, contact Daniel Auguste, Clinical Trial System Analyst at ovprshelpdesk@miami.edu

.

Question 2: External IRB ID:
If you have the external IRB's identification number for this study, enter the number. If you do not have the number, leave the field blank.

Question 3: Specify the reason the study should be reviewed by an external IRB **(This is required)**:

Enter:

(1) Required by regulation; or

(2) Required by sponsor as a condition of conducting the trial. If neither of these answers are correct, you should not use an external IRB. Instead, the UM HSRO should review the study.

Example

External IRB

1. * **External IRB:**
   StrokeNet CIRB

2. **External study ID:**

3. **Approval letter from external IRB:**

4. **Initial approval date by external IRB:**

5. **Last day of approval period:**

6. * **Specify the reason(s) the study should be reviewed by an external IRB (check all that apply):**
   - [x] Required by regulation
   - [ ] Required by sponsor as a condition of conducting the trial
   - [ ] Other

7. **If Other, specify the reason the study should be reviewed by an external IRB:**

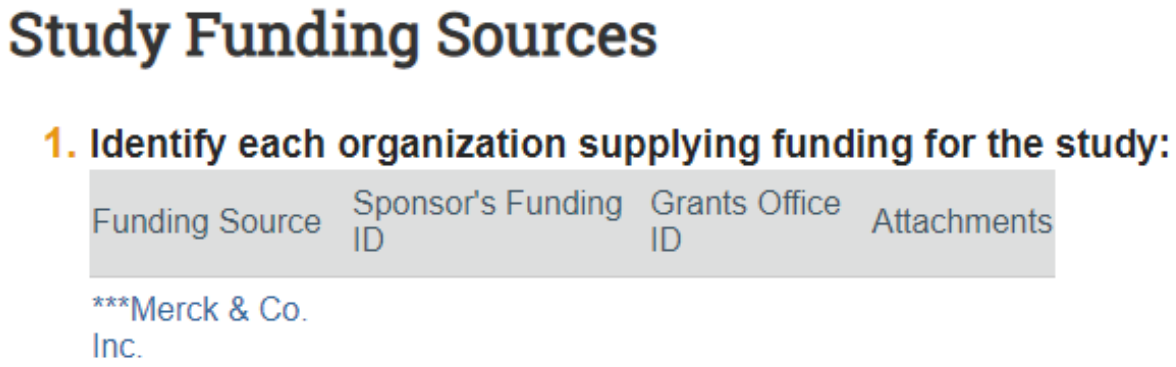
Study Funding Sources - to capture general funding source information

(e.g. NIH, industry sponsor, etc.)

Question 1: Identify each organization supplying funding for the study

Select: "+ Add" to Enter the funding sources

Example:

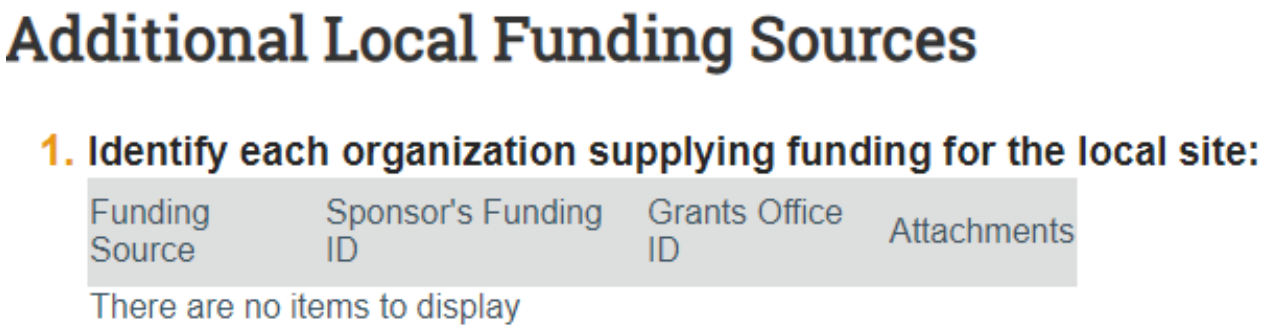


Additional Local Funding Sources –

Question 1: Identify each organization supplying funding for the local site:

If applicable, Select "+ Add" to Enter the funding sources – You so not need to upload the grant or contract.

Example:



Local Study Team Members – To capture UM Study Team

21. **Question 1:** Identify each additional person involved in the design, conduct or reporting of the research:
    Select "+ Add" to Enter a study team member. Select the study team members from the menu. Check to see if their training is current. Training requirements are described in the Investigator Manual.

22. **Question 2:** External team member information:
    If anyone outside of the University of Miami will be working on this study under the local PI's oversight, list them here. Do not list team members who will not be under the PI's supervision.

23. **Question 3:** Will any outside agency or organization conduct protocol-required research procedures.
    Select yes or no and if yes provide an explanation & lists procedures.

Example:

Local Study Team Members

1. **Identify each additional person involved in the design, conduct, or reporting of the research:**

Name	Roles	Financial Interest Review Status	COI Expiration Date (CITI)	HSR Expiration Date (CITI)	GCP Expiration Date (CITI)	Involved in Consent	E-mail	Phone
Jeffrey Hernandez	Study Coordinator	Pending Creation	Account disabled	Account disabled	Account disabled	yes	Jhern129@fiu.edu	305-484-0559
UMTest StudyStaff1 (ss1)	Student or trainee mentor	Pending Creation	Not Found	Not Found	Not Found	no	eprost@med.miami.edu	503.123.4567

2. **External team member information:**

Name	Description

There are no items to display

3. * **Will any outside agency or organization conduct protocol-required research procedures (i.e. recruitment, survey companies, home health agencies) for this study?**

○ Yes ● **No**

a. If yes, please explain who will be conducting procedures and list the procedures the external agency/organization will conduct.

Study Scope

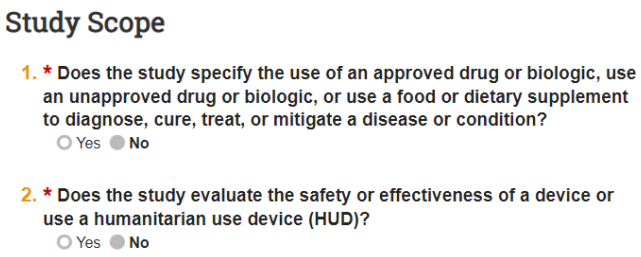
Question 1: Does the study specify the use of an approved drug or biologic, use of an unapproved drug or biologic, or use a food or dietary supplement to diagnose, cure, treat, or mitigate a disease or condition?

Select either yes or no.

Question 2: Does the study evaluate the safety or effectiveness of a device or use a humanitarian use device?

Select either yes or no.

Example:


Study Scope

1. * Does the study specify the use of an approved drug or biologic, use an unapproved drug or biologic, or use a food or dietary supplement to diagnose, cure, treat, or mitigate a disease or condition?
   ○ Yes ● No

2. * Does the study evaluate the safety or effectiveness of a device or use a humanitarian use device (HUD)?
   ○ Yes ● No

Devices or Drugs information (Depends on the scope of the study)

Devices

1. * **Select each device the study will use as an HUD or evaluate for safety or effectiveness:**

Add		
Device	Humanitarian Use Device	Attachment Name
There are no items to display		

2. * **Device exemptions applicable to this study:**
   - O IDE number
   - O HDE number
   - O Claim of abbreviated IDE (nonsignificant risk device)
   - O Exempt from IDE requirements

   Clear

3. **Attach files:** (such as IDE, HDE, or other information that was not attached for a specific device)

Add			
Document	Category	Date Modified	Document History
There are no items to display			

OR

Drugs

1. * **List all drugs, biologics, foods, and dietary supplements to be used in the study:**

Add		
Generic Name	Brand Name	Attachment Name
There are no items to display		

2. * **Will the study be conducted under any IND numbers?**

   O Yes O No Clear

3. **Attach files:** (such as IND or other information that was not attached for a specific drug)

Add			
Document	Category	Date Modified	Document History
There are no items to display			

Study Scope

Questions 3-13:

Always review the Study Scope section of the IBIS smart form and ensure that all the applicable ancillary reviews have been added.

It is the PI and study team's responsibility to add all applicable ancillary reviews via the Manage Ancillary Reviews activity in IBIS after the smart form is completed and submitted.

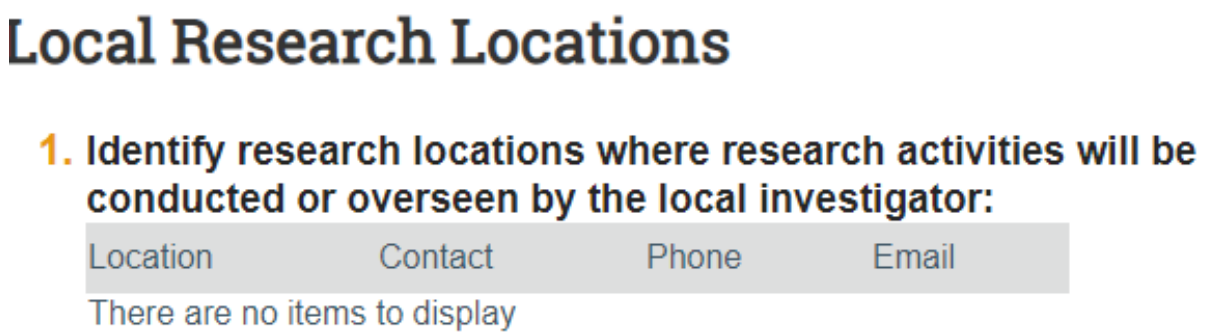
Answering the question with a "Yes" does not automatically add the ancillary reviewer that corresponds to the question.

Example:

Local Research Locations

Question 1: Identify research locations where research activities will be conducted or overseen by the local investigator:
If the local PI will be overseeing a local facility that is not part of UM or Jackson Health Systems, list the site here. Do not list other participating sites that are not under the UM PI's oversight.

Example:



Local Research Locations

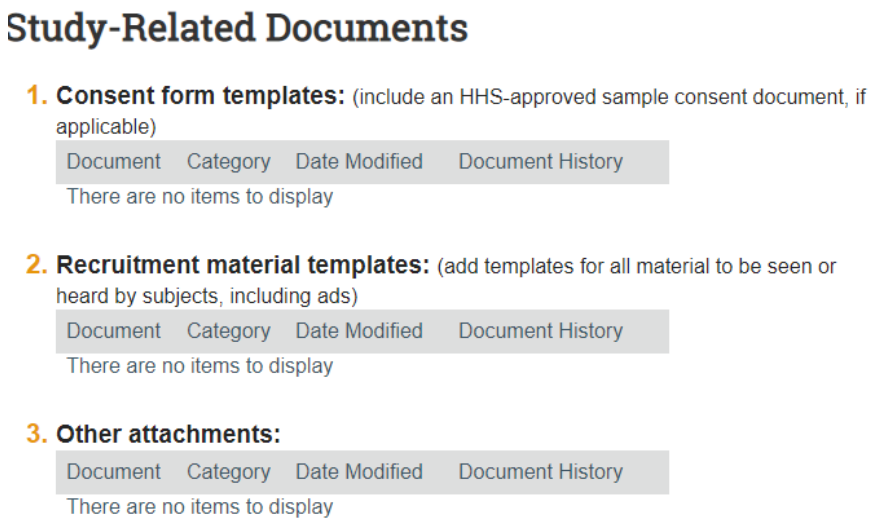
1. **Identify research locations where research activities will be conducted or overseen by the local investigator:**

Location	Contact	Phone	Email
There are no items to display			

Study-Related Documents

27. Questions 1-3: If the external IRB has not yet approved the study and you have study template documents, you may upload them here.

Example:



Local Site Documents

28. Questions 1-3:

i. Consent Forms (to be finalized in IBIS) – This goes to Velos D-Link
ii. Localized Recruitment Materials (to be finalized in IBIS) – This goes to Velos D-Link
iii. Other Attachments
    1. HIPAA (to be finalized in IBIS) – This goes to Velos D-Link
    2. Ancillary Review Forms
        a. Biological Agents Registration Form
        b. CTRS Service Request Form
        c. ESCRO Form
        d. IBC Supplemental Form
        e. JHS CTO Application Form
        f. UHT Application Form
        g. Research Data Security Assessment Form
    3. Genomic Data Sharing Plan
    4. NIH Institutional Certification
    5. Certificate of Confidentiality
    6. Data Use Agreement
    7. Patient Forms
        a. Questionnaire/Survey/Interview/Diary
    8. Other (to be finalized in eProst) – This goes to Velos D-Link
    9. HRP-216 External IRB Application to Cede Review to an External

Example:

Local Site Documents

1. **Consent forms:** (include an HHS-approved sample consent document, if applicable)

	Document	Category	Date Modified	Document History
View	UM ICF language_single-irb-and-reliances.pdf(0.01)	Consent Form	10/28/2019	History

2. **Recruitment materials:** (add all material to be seen or heard by subjects, including ads)

	Document	Category	Date Modified	Document History
View	UM ICF language_single-irb-and-reliances.pdf(0.01)	Recruitment Materials	10/28/2019	History

3. **Other attachments:**

Document	Category	Date Modified	Document History
There are no items to display			

Suggested attachments:

- Completed checklist of meeting Department of Energy requirements, if applicable
- Other site-related documents not attached on previous forms

Study-Related Documents vs. Local Site Documents

The keys to knowing where to upload documents are two factors:

1.) Is the document Study-Wide or Site-Specific?
2.) Does this document need to be finalized?

Study-Wide documents - Documents provided to all participating sites and are usually master forms and/or templates.
- Uploaded to the **Study-Related Documents** section.

Site-Specific documents - Documents specific to UM site, such as the HRP 216 form, reliance agreements (ei. SMART documents), Local Context Forms (LCF), localized consents, localized recruitment materials, certificate of action, approval letter, etc.
- Uploaded to the **Local Site Documents** section.

It's important to note documents that must be finalized are **consent forms**, and **local recruitment materials**. Also, that new versions of older documents must be uploaded as updates to the previous versions by clicking the "Update" button next to the older version. Please do not upload new versions of older documents as separate files.

The remaining questions are the general questions asked for all initial review submissions. Complete the submission by answering each question.

Final Page

29. Click “Finish”

30. Click “Submit”

Submission moves to **“Pre-review”** state, pending HSRO administrative review.

HSRO Administrative review

1. External IRB and study qualification for reliance

I. Signed HRP-216 forwarded via “Communication”. Study team instructed to upload the document in IBIS and send to the reviewing IRB as acknowledgement.

II. Ensure authorization agreement is in place.

- Standard agreement from the external IRB
- Master agreement (i.e.. Advarra, WCG, NCI)
- Smart IRB Master Reciprocal Agreement; Online Portal or Letter of Agreement (LOA)
- IREx Reliance Exchange Online Portal

HSRO Administrative review

2. Assist with providing UM local context information

- Purpose : Used by external IRB to review for UM
  - I. UM Local context document
    - ➢ Available on reliance webpage
  - II. Custom questionnaire from the external IRB
    - ➢ Reviewing IRB sends materials to collect information about local context.
      - Institutional policies and procedures
      - State law
      - Study specific requirement

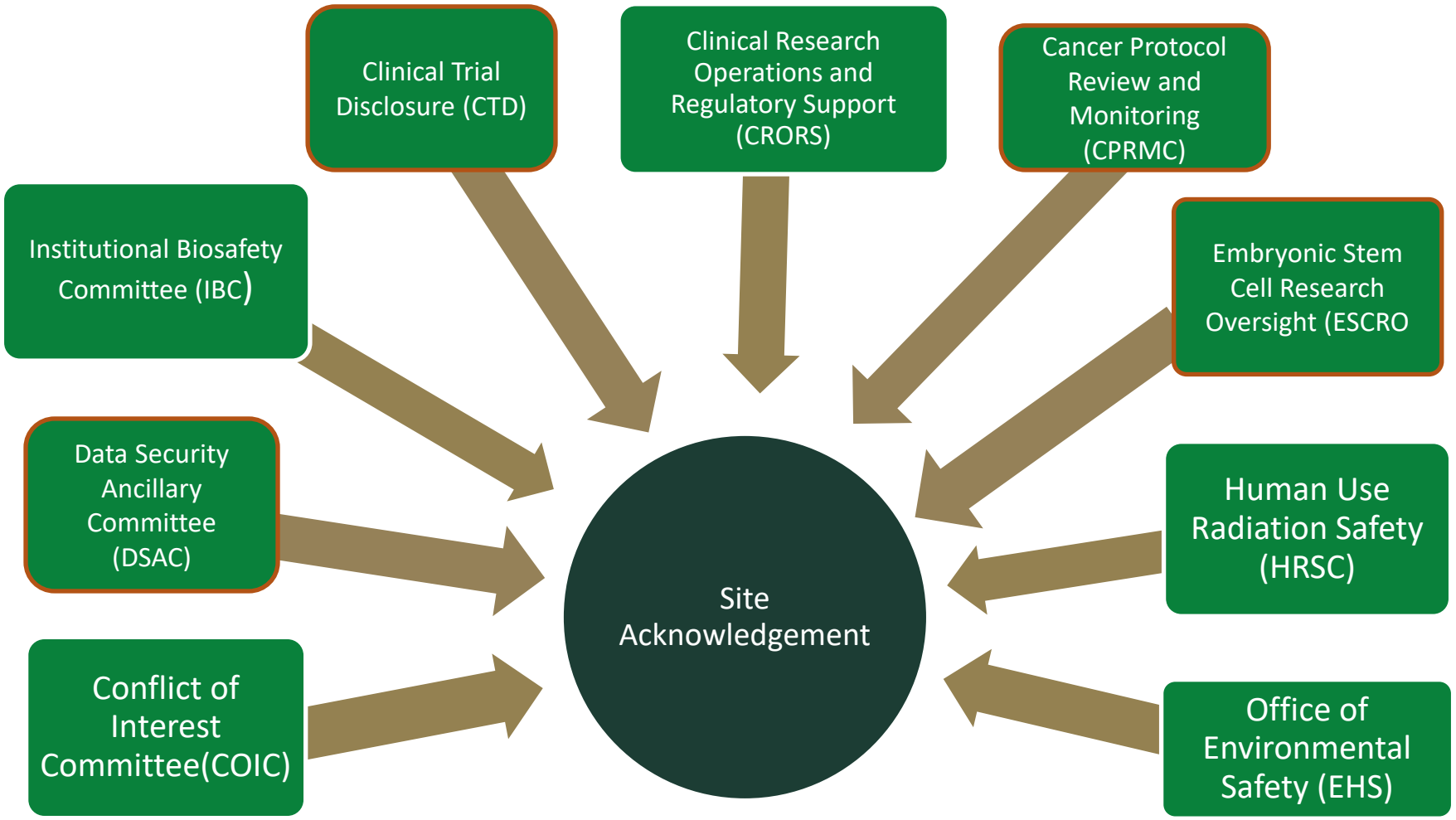
Study team completes this questionnaire in conjunction with reliance team.

HSRO Administrative review

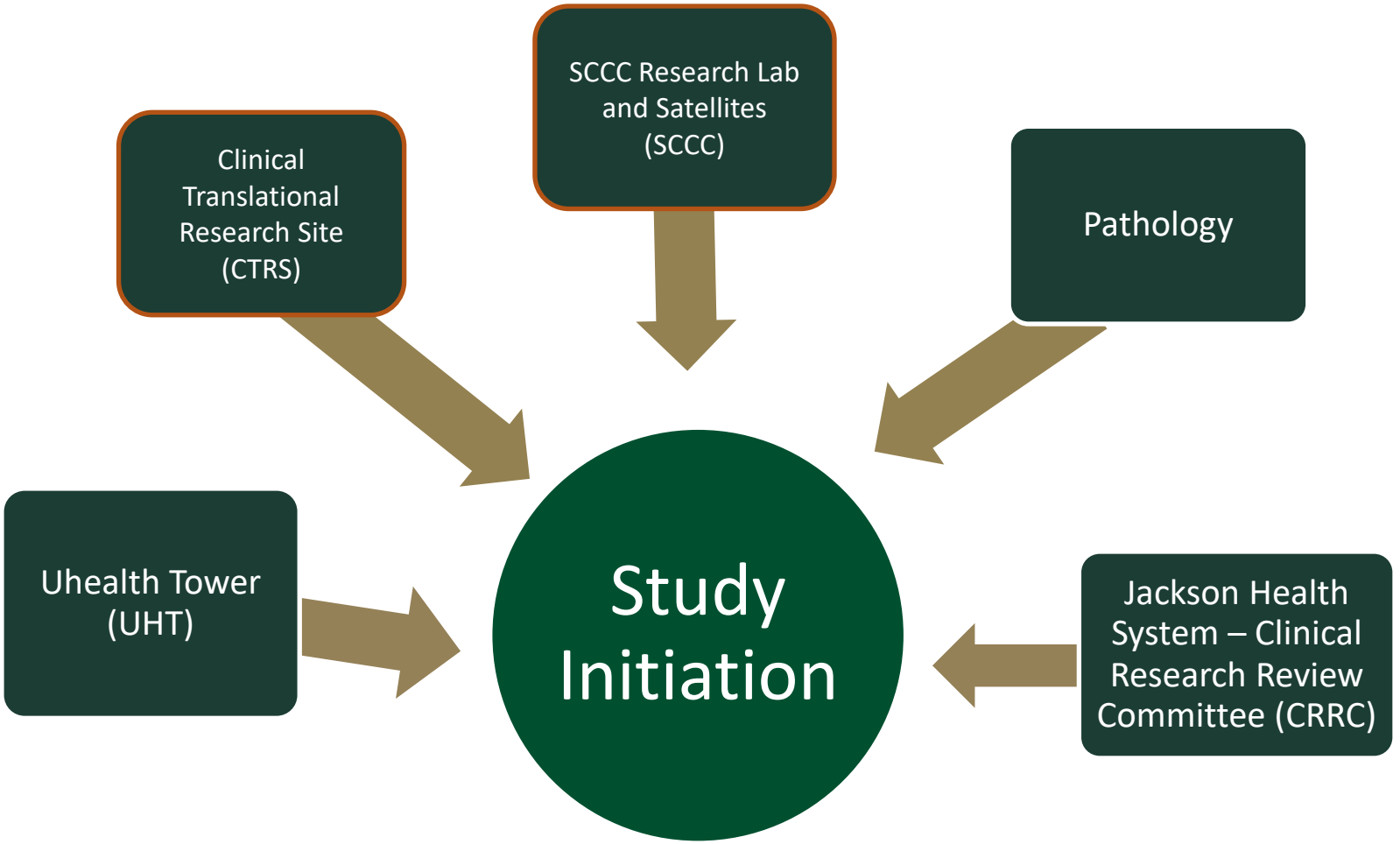
3. Ancillary reviews and study team training

- Financial Interest Review Status for Conflicts of Interest
  - i. If status is *"Awaiting Profile Review"*, HSRO "*Adds comment*" to notify that the personnel has not disclosed.
  - ii. If status is "*Administrative Review*", HSRO "*Adds comment*" to notify the study is pending COI review.
  - iii. If status *is "Under Review", it may take the DSAM/COI Team 5-7 business days to complete their part of the review.*
  - iv. If COI review concludes there is a conflict, the single IRB review cannot be acknowledged until the conflict is added to the ICF.
    - HSRO will "*Request Pre-Review Clarification*"
    - Explain why the submission is being sent back and state requirements for approval. (ICF mentioning personnel COI is needed in this case)
- Check Ancillary Reviews
  - i. If the following appear as "*Required*," the "*Accepted*" column must say "*Yes":* PRC/PRMC, IBC, ESCRO, HRSC, UHT, JHS… etc. must all show "yes"

Ancillary Reviews
Required Before Site Acknowledgement



Ancillary Reviews
Required Before Research Commences



HSRO Administrative Review

4. **Check if appropriate ICF documents are submitted (UM; JHS or combined template language)**

   a. Changes requested as needed. A copy of ICF must be uploaded as a comment.
      - This copy must highlight the applicable UM language requirement in the document.

   b. Once all required elements are satisfied, HSRO **"Confirms reliance"** and instruct study team via comment to submit documents to external IRB for approval of UM site.

      Submission will move to **"Pending sIRB Review "** State.

Post External IRB Review

- **Study team submits external IRB approved materials in IBIS:**
  - Approval letter from external IRB that states UM has been approved as a research site
  - IRB-approved local consent/assent form(s)
  - IRB-approved recruitment materials
  - Other local related documents.

HSRO Acknowledgement of External IRB Determination

Upon receipt of external IRB approval for UM, the HSRO will:

a. Record external IRB Decision

b. Finalize Documents

c. Ensure completion of required ancillary reviews

d. Notify study team of acknowledgement by sending a letter in IBIS.

Refrain from starting the research until approval from external IRB, confirmation from the UM HSRO, all required ancillaries and sponsor start-up approval are received.

Ongoing activities after initial approval

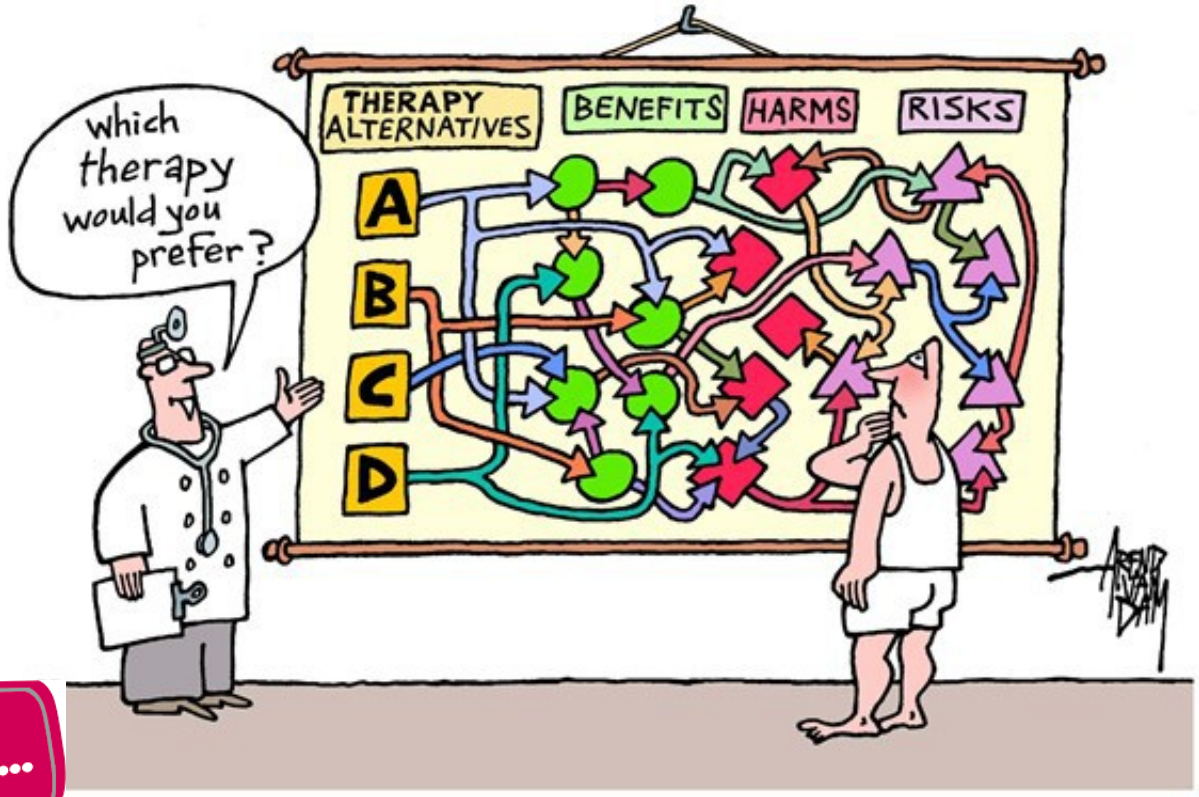
During the course of the research, the site must submit the following as modification, or RNI in IBIS:

- Any document that needs to be uploaded into VELOS as a modification.
- Reports of non-compliance that could meet the UM's definition of serious or continuing non-compliance
- IRB determinations of unanticipated problems involving risks to subjects or other.
- IRB suspensions or terminations of study
- Final report

Note: UM does not require Continuing Reports (CR) for studies reviewed by external IRBs.

Report Continuing Review Data activity is used to submit CRs and Final Reports.

Tips for IRB Submissions



informed consent

Quick Tip...

- Incorporate applicable language required by UM in the informed consent document.

Tips for IRB Submissions

- Ensure that study team COI (financial disclosure) has been submitted in the Udisclose system.

Tips for IRB Submissions

- Do NOT add study team members while a submission is in “Pending sIRB Review” status.

Tips for IRB Submissions

- Ensure that all applicable ancillary reviews are added via the Manage Ancillary Reviews activity in IBIS.

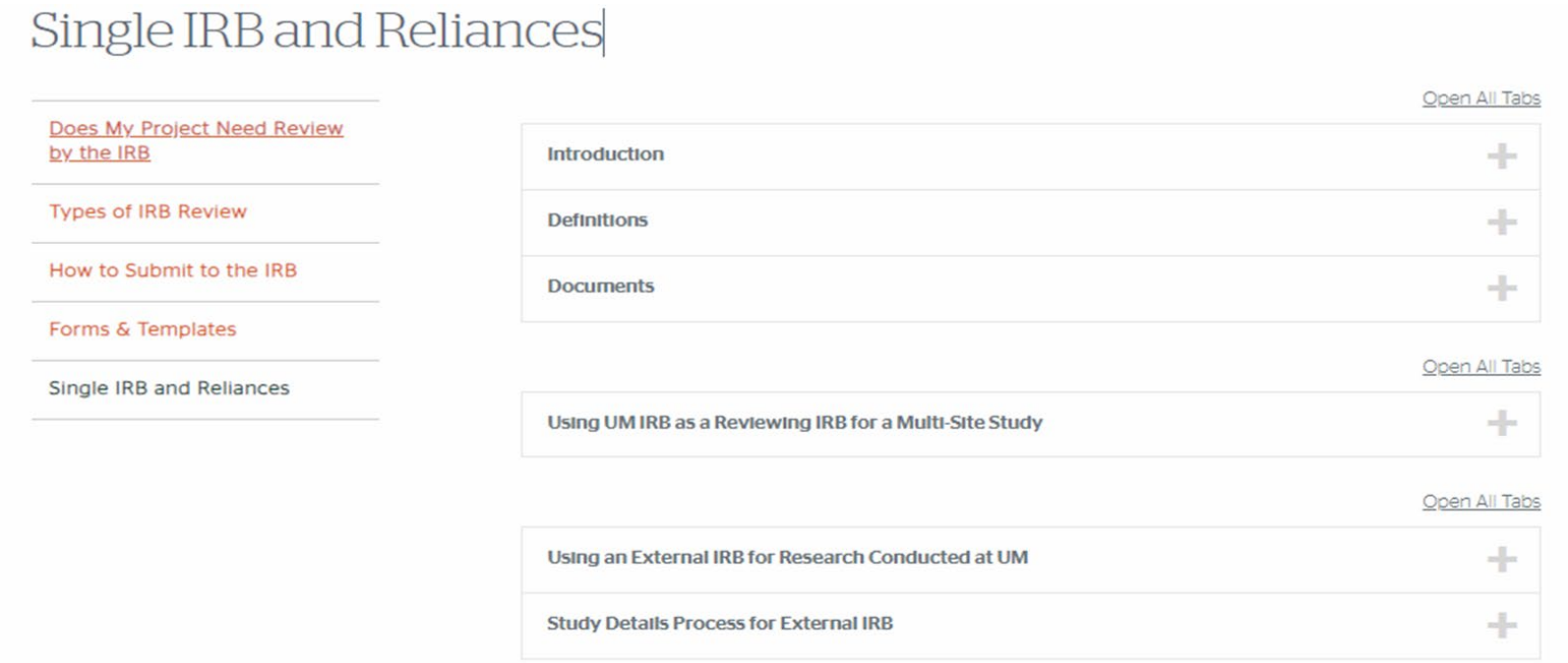
Tips for IRB Submissions

- Read the external IRB determination letter in full. The IRB may determine further action from the PI or study team.
- Read the HSRO acknowledgement letter in full.
- Ensure documents are uploaded in the appropriate sections of the IBIS application

Review Turnaround Time

- **Factors that impact turnaround time**:
  - Submission quality
  - Inconsistencies
  - External reviews (ancillary reviews, department reviews, COI reviews, etc.)
  - IRB workload

Reliance information on HSRO website



https://hsro.uresearch.miami.edu/submit-to-the-irb/single-irb-and-reliances/index.html

Thank you for attending

- Check the HSRO website and Reliance page often
- When in Doubt…

  Call us: 305-243-3195

  Reach out by email and/or TEAMS

  If needed, we can set up a consultation appointment with the reliance team.