Grant Submissions: Human Subject Section, Single IRB Review, and IRB Review fees

Kimberly Summers, PharmD
Director Research Protection Programs

The Research Protection Programs Offices are resources of the Office of the Vice President for Research
Single IRB Review
NIH Use of Single IRB for Multi-site Research

• Single IRB (sIRB) of record will be used in the ethical review of non-exempt human subjects research protocols funded by the NIH that are carried out at more than one site in the United States.

• Applies to all competing grant applications (new, renewal, revision, or resubmission) with receipt dates on or after May 25, 2017.

• Ongoing, non-competing awards will not be expected to comply with this policy until the grantee submits a competing renewal application.

• **Effective date January 25, 2018**
Single IRB for Cooperative Research Under the 2018 Common Rule

• Defined as those projects covered by the Rule that occur at more than one institution
• Applies only to US study sites engaged in cooperative research
• Includes research were different activities will be conducted at each participating site
• Effective date January 2020
Single IRB Requirement

The reviewing IRB is identified by

- The Federal department or agency supporting or conducting the research OR
- Proposed by the lead institution subject to the acceptance of the Federal department or agency supporting the research.
Why is it important to involve the local research office early in the process?

Confusion about Reliance Process
- Identification of appropriate sIRB (review and rely)
- Who gets contacted?
- PI or wrong administrator signing agreements

sIRB Staff
Lots of Education
Written Policies/procedures
UT Health San Antonio IRB and OCR Resources

• Institution signed on to the NIH SMART IRB reliance agreement
• Assistance with wording for a single IRB Plan for grant submission
• Support letters for single IRB review and implementation
  • UT Health San Antonio IRB of record
  • UT Health San Antonio deferring to another IRB of record
• Starts with the grant writing step
The Research Protection Programs Offices are resources of the Office of the Vice President for Research

Single IRB Review for Multi-Site Research where UTHSA IRB is the Reviewing IRB

UTHSA has negotiated several Agreements that may be applicable when UTHSA researchers are involved in collaborative research.

If there are plans to utilize a single IRB for the review of multiple sites for the first time, contact the IRB staff prior to submitting (210-567-8250 or IRB@uthscsa.edu). This is an important step to ensure that the reviewing IRB and relying sites have standard operating procedures in place to manage the collaboration.

If study sites include affiliated sites (e.g., University Health System and/or South Texas Veterans Health Care System), instructions for Single IRB Review for Multi-Site Research do not apply.

If you are collaborating with a study site and would like to implement single IRB review, the most ideal IRB Authorization Agreement is use of the SMART IRB Reliance platform.
The Research Protection Programs Offices are resources of the Office of the Vice President for Research

- **Stage 1**
  - If UTHSA is the reviewing IRB, the Lead PI will download and complete **required application documents** and submits the application to the UTHSA IRB.
  - Application must include ceding site specific requirements, if necessary (e.g. site specific required consent form language)
  - *Important note:* If relying sites have not documented ceding determination by the time the Lead PI is ready to submit, it may be necessary to add the site through an amendment process instead of during the initial review.

- **Stage 2**
  - Submit the IRB application documents
  - If including ceding study sites during initial review, local context information is required to be included in submission documents.

- **Stage 3**
  - The Lead PI/Study Staff will work with the UTHSA IRB office to prepare application for IRB review and receive IRB approval.

- **Stage 4**
  - Obtain institutional activation from each participating site (i.e. UTHSA and UHS) prior to initiating research at that site.
UTHSCSA has negotiated several Agreements that may be applicable when UTHSCSA researchers are involved in collaborative research.

If you are utilizing an external IRB for the first time, contact the OCR staff prior to submitting (210-567-8555 or OCRMail@uthscsa.edu).

- Local Review Fees for Studies Reviewed by External Central IRBs
- WIRB Review Fees
The Research Protection Programs Offices are resources of the Office of the Vice President for Research

- Stage 1
  - Complete Institutional Research Application and Supporting Documents
  - Complete Inst-M - Personnel Form
  - Complete Form A - Signature Assurance Sheet
  - Complete Consent Form with local contact info/HIPAA
  - Submit these completed documents with a copy of the protocol to OCRMail@uthscsa.edu

- Stage 2
  - Submit to the IRB of record for approval through the Overall PI/Coordinating Center (include consent form [with local contact info/HIPAA] provided/reviewed by OCR staff)

- Stage 3
  - Submit IRB Approval Letter and Informed Consent Document(s) to assigned OCR analyst

- Stage 4
  - An institutional activation letter from each participating site (i.e. UTHSCSA, UHS) is required prior to initiating your research.
IRB Review Fees
# NIH SMART IRB Guidance

## Before the Single IRB Policy

1. Research team obtains input from budget and other fiscal experts as part of developing a funding proposal.

## After the Single IRB Policy

1. Research team obtains input from budget and other fiscal experts as part of developing a funding proposal. In addition, the research team reaches out to their local IRB or human research protection program (HRPP) office to:
   - Obtain input on budget for sIRB review, such as IRB fees.
   - Begin outreach to other institutions regarding sIRB arrangement (e.g., who will serve as the Reviewing IRB and which institutions will rely on that IRB).

2. The institution’s sponsored programs office submits the proposal to the funding agency.

2. The institution’s sponsored programs office submits the proposal to the funding agency, including information about the proposed reliance arrangement, such as:
   - A confirmation that the NIH sIRB Policy will be followed.
   - The proposed sIRB and proposed relying institutions.
   - The IRB agreement that will be used for the reliance arrangement, such as the SMART IRB Agreement, and a description of how that agreement addresses the sIRB policy’s communication plan requirement.
   - Budget needs related to sIRB review, such as IRB review fees and additional resources required to support communication between the sIRB and the relying site study teams (e.g., coordinating center or regulatory personnel).
## What IRB Costs can be Included in the Grant Budget?

<table>
<thead>
<tr>
<th>Allowable Costs?</th>
<th>IRB in F&amp;A</th>
<th>IRB not in F&amp;A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Cost</td>
<td>Secondary Activities</td>
<td>Primary &amp; Secondary Activities</td>
</tr>
<tr>
<td>Indirect Cost</td>
<td>Primary Activities</td>
<td>None</td>
</tr>
</tbody>
</table>
## Primary Activities

<table>
<thead>
<tr>
<th>SERVICE OR TRANSACTION</th>
<th>INDIRECT COST MODEL</th>
<th>DIRECT COST MODEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Review of Protocol</td>
<td>✗</td>
<td>✓</td>
</tr>
<tr>
<td>Review of Local Investigator</td>
<td>✗</td>
<td>✓</td>
</tr>
<tr>
<td>Overall Protocol Modifications</td>
<td>✗</td>
<td>✓</td>
</tr>
<tr>
<td>Annual/Continuing Review</td>
<td>✗</td>
<td>✓</td>
</tr>
<tr>
<td>Approval of Study-wide Translated ICFs</td>
<td>✗</td>
<td>✓</td>
</tr>
<tr>
<td>Reportable events* (at Reviewing IRB’s local site)</td>
<td>✗</td>
<td>✓</td>
</tr>
<tr>
<td>Overall Study Closeout</td>
<td>✗</td>
<td>✓</td>
</tr>
</tbody>
</table>
### Secondary Activities

<table>
<thead>
<tr>
<th>SERVICE OR TRANSACTION</th>
<th>INDIRECT COST MODEL</th>
<th>DIRECT COST MODEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Addition of sites 2-xx</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td><em>Excludes local site</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Annual/Continuing Review of sites 2-xx</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td><em>Excludes local site</em></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reportable events* at sites 2-xx</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Site-specific Modifications</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Change of Relying Principal Investigator</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Approval of Site-specific Recruitment Documents</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Audit As requested</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Site Closeout</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>New IRB Reliance Agreement</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
Human Subjects Section for Clinical Trials

Human Subjects and Clinical Trials Information form

Clinical trial protocol template
Human Subjects and Clinical Trials Information Form

• All contract proposals for Requests for Proposals issued as of January 25, 2018
• All grant application packages for all human subjects and/or clinical trial research applications for due dates on and after January 25, 2018

• Does your project involve human subjects?
• Does your project meet the NIH definition of a clinical trial?
Human Subjects Definition

Human subjects’ research = an investigator (whether professional or student) conducting research and obtains data about:

- **A living individual** through **intervention or interaction** with the individual, or
- Accessing **identifiable private information** about a **living individual**
FDA regulated human subjects’ research

A test article will be used on one or more humans;

- Involves the use of a drug, other than the use of a marketed drug in the course of medical practice; or
- Involves the use of a device to evaluate safety or effectiveness of that device; and
- Data from the activity will be submitted to, or held for inspection by, the FDA in support of a marketing or research application for an FDA-regulated product; or
- Data obtained from controls (or from the use of the device) will be submitted to, or held for inspection by the FDA in support of a marketing or research application for an FDA-regulated product

Note: FDA does not address issues of living subjects, interaction, or identifiable data as DHHS does.
NIH Clinical Trial Definition

• A research study
  • in which one or more human participants
  • are prospectively assigned
  • to one or more interventions (which may include placebo or other control)
  • to evaluate the effects of those interventions on health-related biomedical or behavioral outcomes.
FORMS-E Application Packages

• Initiative to enhance stewardship of clinical trials
• Consolidates all Human Subjects and Clinical Trial related information
  • Human subjects, inclusion enrollment, and clinical trial information previously collected across multiple agency forms
• Expands the information required for clinical trials
  • Collects information at the study level
  • Expands the use of discrete form fields to capture clinical trial information to provide the level of detail needed for peer review
• Presents key information to reviewers and agency staff in a consistent format
• Aligns with ClinicalTrials.gov and positions the NIH for future data exchange with ClinicalTrials.gov
Annotated Form Set for NIH Grant Applications
FORMS-E Series

Complete human subjects section of R&R Other Project Information form prior to completing this form.

PHS Human Subjects and Clinical Trials Information

Please complete the human subjects section of the Research & Related Other Project Information form prior to completing this form.

The following items are taken from the Research & Related Other Project Information form and displayed here for your reference. Any changes to these fields must be made on the Research & Related Other Project Information form and may impact the data items you are required to complete on this form.

Are Human Subjects Involved?  
☐ Yes  ☐ No

Is the Project Exempt from Federal regulations?  
☐ Yes  ☐ No

Exemption number:  
☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8

Information populated from R&R Other Project Information form.

If No to Human Subjects

Does the proposed research involve human specimens and/or data?  
☐ Yes  ☐ No

If Yes, provide an explanation of why the application does not involve human subjects research.

☐ Required if Yes to human specimens/data question.

Skip the rest of the PHS Human Subjects and Clinical Trials Information Form.

When human subjects is No, applicants answer a single question, provide associated attachment (as applicable), and are done with the form unless instructed in announcement to include Other Requested Information attachment.

If Yes to Human Subjects

Add a record for each proposed Human Subject Study by selecting ‘Add New Study’ or ‘Add New Delayed Onset Study’ as appropriate. Delayed onset studies are those for which there is no well-defined plan for human subject involvement at the time of submission, per agency policies on Delayed Onset Studies. For delayed onset studies, you will provide the study name and a justification for omission of human subjects study information.
1.4. * Clinical Trial Questionnaire

Answers to questionnaire required and system enforced.

If the answers to all four questions below are yes, this study meets the definition of a Clinical Trial.

1.4.a. Does the study involve human participants?
1.4.b. Are the participants prospectively assigned to an intervention?
1.4.c. Is the study designed to evaluate the effect of the intervention on the participants?
1.4.d. Is the effect that will be evaluated a health-related biomedical or behavioral outcome?

If four questions are all Yes AND FOA allows clinical trials, then study will be flagged as a Clinical Trial (CT) study.*

1.5. Provide the ClinicalTrials.gov Identifier (e.g., NCT87654321) for this trial, if applicable
Why Does My Human Subjects Section Have to be Completed to Approve My Budget?

- IRB
- OSP
- Cayuse
Cayuse for Grant Submissions

• Forms are locked after budget review
• Attachments can continue to be added
• Short answer questions within forms
  • Conditions or focus of study
  • Eligibility criteria
  • Overall structure of the study team
  • Brief summary
  • Narrative study description
  • Interventions
  • Outcome measures
  • Subject participation duration
NIH and FDA Clinical Trial Protocol Template

• Assists in preparing Phase 2 and 3 IND/IDE trial protocols
• Goal to enable efficient reviews by both the IRB and the FDA

• Web-based platform for interactive use of the template
  • Electronic Protocol Writing Tool
  • Allows for a collaborative approach to writing and reviewing protocols
  • Able to form a “protocol writing team”, assign different individuals with writing and reviewing roles
  • Track the progress of the protocol, share comments between team members and keep accurate version control.
Conclusions

Positive changes can only occur with well thought out implementation plans…
Contact Us

• Office of the IRB (OIRB)
  • IRB@uthscsa.edu (210) 567-8250
  • IRB Website: http://research.uthscsa.edu/irb
  • Email Submissions to: IRBMail@uthscsa.edu

• Office of Clinical Research (OCR)
  • OCRMail@uthscsa.edu (210) 567-8555
  • IRB Website: http://research.uthscsa.edu/ocr