Collaborative Research and how to make it happen

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Meeting Objectives

Overview
Gain a basic understanding of what reliance is

Eligibility
Learn about what constitutes as eligible for reliance

Execution & Responsibilities
Set-up Instructions / Lead site vs. Participating site responsibilities
What is reliance and why do I need it?
Why do I need reliance?

<table>
<thead>
<tr>
<th><strong>NIH sIRB Policy</strong></th>
<th><strong>Revised Common Rule</strong></th>
<th><strong>Reduce Burden</strong></th>
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<tbody>
<tr>
<td>January 25, 2018</td>
<td>January 20, 2020</td>
<td>Always been the practice of choice</td>
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**NIH funded multi-site studies involving non-exempt human subjects research**

“Same protocol” – same research questions, involving same methodologies and outcomes

**Revised Common Rule**

“Cooperative Research” – more than one institution

Any US site engages in cooperative research that is subject to the Common Rule

45 CFR 46.114

Reduces duplication of efforts and administrative burden
As a researcher, where should I start?

You probably have multiple roles that relate to your research (academically, professionally, personally)

The Multiple “Hats” That Researchers Wear

- Harvard hat
- Hospital hat
- Home institution hat
- Volunteer hat
- Consultant hat
- Unicorn hat
Despite the many “hats” you’re wearing, ask yourself...

1. Is the research you’re conducting in fulfillment of a Harvard-related course, degree program, and/or academic requirement (e.g. capstone, thesis, dissertation, practicum, etc)?

2. Are you representing yourself as a Harvard-affiliate while conducting the research?

If **YES**, you are wearing your Harvard “hat”; Harvard IRB review is required.

If **NO**, you are not wearing your Harvard “hat”; Harvard IRB review is not required.

*When in doubt, check in with the IRB*

Additional information on this topic can be found on HLC IRB Tip Sheets: Agent of Harvard & Dual Affiliation
But wait...it doesn’t stop there!

Regardless of whether you are/are not wearing your Harvard “hat” – IRB review at the institutions where you wear other “hats” may still be required.

You must check in with every institution you are affiliated with to ensure their IRB requirements are met.

What if I need more than one IRB review?

In some instances, where multiple IRBs are involved in a research project, IRBs can agree to “rely” on one single IRB for review. This is common when:

• The research project is ongoing and is led by a non-Harvard PI
• You will be, or have been, added as a study team member to that project

Harvard is willing to consider reliance agreements with other institutions if:

• The institution is within the US
• The research is non-Exempt
• The reliance agreement meets Harvard’s criteria

More information can be found here: ORARC Reliance Support webpage
Reliance is Multidimensional...

- Each with individual needs:
  - Pre-submission
  - IRB System
  - Organizational Policies
  - Additional Paperwork / SMART IRB (IAA, LCF, etc.)
Reliance can feel intimidating...

Don’t worry, we are here to help! 😊
Reliance Eligibility
Let’s talk about human subjects’ research...

For reliance to take place we need to ensure we are engaged in non-exempt, human subjects research.
Types of IRB Review

1. Not Research
   Activities do not meet the regulatory definition of "research"

2. Not Human Subjects Research
   Activities do not meet the regulatory definition of research involving "human subjects"

3. Exempt
   Research activities involving human subjects that fall into one of the eight categories

4. Expedited
   Research activities involving human subjects that involve no more than minimal risk

5. Reliance Eligible
   Research involving human subjects that does not qualify for Exempt or Expedited review, typically involving greater than minimal risk to subjects.
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Reliance Execution
Three Essential Elements

1. IRB approval notice
   (lead site)

2. IRB Authorization Agreement or IAA
   (typically SMART IRB)

3. Institutional Authorization
   (home site)
Three Essential Elements

1. IRB approval notice
   (lead site)
2. IRB Authorization Agreement or IAA
   (typically SMART IRB)
3. Institutional Authorization
   (home site)

1. Obtain IRB approval from:
   ________________________________

2. Obtain IAA
   - SMART IRB # ______ - OR -
   - Traditional Form

3. Finalize ESTR app
   - ESTR # ______

*Please note that steps 2 and 3 can be worked on simultaneously, but step 3 cannot be finalized without step 2 completion*
Harvard Serves as Lead IRB (aka Reviewing IRB, IRB of Record)

1. Harvard Site Team
   - Identify how sites will be involved

2. Harvard Site Team
   - Make sure ESTR app indicates reliance

3. Harvard Site Team
   - Begin either SMART IRB or IAA process

4. Reliance Coordinator
   - Finalize IAA after all sites have completed their portion

5. Reliance Coordinator
   - IAA is attached in ESTR and reliance is confirmed

6. Harvard Site Team
   - Provide notice to sites and add them in ESTR
Harvard Serves as Lead IRB (ESTR app)

Step 2

Visit a main study workspace (in any state), where it is indicated on the Basic Information page of the SmartForm that BOTH:

This is a **collaborative or multisite study** AND
Harvard will act as the **IRB of record** for any project.

**ESTR Example**

4. *What kind of study is this?*
   - Multi-site or Collaborative study
     - Choose 'multi-site or collaborative' where there is more than one site conducting the study, if there is possible collaboration with non-Harvard researchers, or if it is unclear if there will be additional sites.

5. *Will an external IRB act as the IRB of record for this study?*
   - [ ] Yes
   - [ ] No

6. *Will your IRB act as the single IRB of record for other participating sites?*
   - [ ] Yes
   - [ ] No
   - Choose 'yes' if there is possible reliance on Harvard review or if reliance is unclear at this time. You will be asked to add and manage site information for this submission via additional activity.
Harvard Serves as Lead IRB (Begin IAA process)

Step 3

If both sites are utilizing the SMART IRB platform then an IAA can be initiated through that process

OR

IAA process can occur independently outside of SMART IRB system and an IAA document will be produced separately

SMART IRB Example

https://smartirb.org/reliance/
Harvard Serves as Lead IRB (Reliance Coordinator)

Steps 4 & 5

Reliance Coordinator finalizes IAA in SMART IRB and in ESTR

4. Reliance Coordinator

- Finalize IAA after all sites have completed their portion

5. Reliance Coordinator

- IAA is attached in ESTR and reliance is confirmed
Harvard Serves as Lead IRB (Begin IAA process)

Step 6

Each participating site needs to be added in to ESTR

Reliance has not been achieved until receipt that site has been added has been confirmed

ESTR Letter Example

August 12, 2020

Protocol Title:

Harvard Principal Investigator: [Name]
Harvard Protocol #: [Protocol Number]
Determination Date: [Date]

[Excerpt from the letter emphasizing the need to add participating sites to ESTR]

Provide notice to sites and add them in ESTR

6. Harvard Site Team
Harvard is a Participating Site (aka Relying Site, pSite)

1. Lead Site Team
   - Works together with Harvard to determine what study activities are occurring at this site

2. Harvard Site Team
   - Make sure ESTR app indicates collaboration (include IRB approval letter from lead site)

3. Harvard Site Team
   - Work with Lead Site to complete IAA either through SMART IRB or via individual agreement.

4. Reliance Coordinator
   - Finalize IAA after all sites have completed their portion.

5. Reliance Coordinator
   - IAA is attached in ESTR, reliance is confirmed, and a letter is issued.
Harvard is a Participating Site (ESTR app)

Step 2
Visit a main study workspace (in any state), where it is indicated on the Basic Information page of the SmartForm that BOTH:

This is a collaborative or multisite study
AND
Harvard will act as the IRB of record for any project

It will also be important to fill in the Basic Local Site and External IRB information

ESTR Example

4. * What kind of study is this?
   Multi-site or Collaborative study
   Choose 'multi-site or collaborative' where there is more than one site conducting the study, if there is possible collaboration with non-Harvard researchers, or if it is unclear if there will be additional sites.

5. * Will an external IRB act as the IRB of record for this study?
   ☐ Yes  ☐ No

Basic Local Site Information

1. * Brief description of activities this site will perform:

External IRB

For more information about the form:
- HUA website
- LMA website

1. * External IRB:

2. Harvard Site Team
   • Make sure ESTR app indicates reliance
Harvard is a Participating Site (Begin IAA process)

**Step 3**

If both sites are utilizing the SMART IRB platform then an IAA can be initiated through that process

OR

IAA process can occur independently outside of SMART IRB system and an IAA document will be produced separately

 SMART IRB Example

https://smartirb.org/reliance/

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3. Harvard Site Team

- Work with Lead Site to complete IAA
Harvard is a Participating Site (Reliance Coordinator)

Step 4
Reliance Coordinator finalizes IAA in SMART IRB or through other methods.
Harvard is a Participating Site (Reliance Coordinator)

Step 5

Reliance Coordinator will send a letter from the ESTR system confirming the reliance process. It will note the institution providing oversight.
Lead Site Responsibilities

The lead site is responsible for providing IRB review of the study just as they would be independent of reliance— but for ALL sites.

While the lead site is ultimately “in charge”, the participating site is not without monitoring responsibilities.

Participating Site Responsibilities

HRPP at participating sites will be responsible for meeting all of its current related responsibilities described in the HHS regulations (45 CFR 46):

- reviewing conflicts of interest
- radiation safety
- ensuring that site investigators obtain informed consent from prospective research participants
- ensuring that site investigators meet local training requirements
- overseeing the implementation of the approved protocol
- reporting local unanticipated problems involving risks to subjects or others, and study progress to the single IRB.
What are the PI responsibilities?

Lead Site PI

- Appendix D (Investigators Manual)

Relying Site PI

- Appendix E (Investigators Manual)

Appendix D Principal Investigator Responsibilities as Overall Site PI for dIRB Study

1. Coordinating with HRPP personnel to determine whether this institution's IRB can act as the single IRB for all or some institutions participating in the study or if an external IRB will assume oversight.
2. Identifying all sites that will be engaged in the human research and requiring oversight by the IRB.
3. Ensure that all sites receive a request to rely on the reviewing IRB and that all institutional requirements are satisfied before a study is activated at a relying site.
4. Collaborate with the reviewing IRB to document roles and responsibilities for communicating and coordinating key information from study teams and the IRB or HRPP at relying sites.
5. Respond to questions or information requests from study teams or the IRB or HRPP staff at relying sites.
6. Provide relying site investigators with the policies of the reviewing IRB.
7. Provide relying site investigators with the IRB-approved versions of all study documents.
8. Preparation and submission of IRB applications on behalf of all sites. This includes initial review, modifications, personnel updates, reportable new information and continuing review information for all sites.
9. Establishing a process for obtaining and collating information from all sites and submitting this information to the reviewing IRB. This includes site-specific variations in study conduct, such as the local consent process and language, subject identification and recruitment processes and local variations in study conduct.
10. Ensuring that consent forms used by relying sites follow the consent template approved by the reviewing IRB and include required language as specified by the relying sites.
11. Providing site investigators with all determinations and communications from the reviewing IRB.
12. Submitting reportable new information from relying sites to the reviewing IRB in accordance with the terms outlined in the authorization agreement or communication plan.
13. Reporting the absence of continuing review information from relying sites if they do not provide the required information prior to submission of the continuing review materials to the reviewing IRB. Notifying the relying site of their lapse in approval and applicable corrective actions.
14. Providing study records to the relying institution, reviewing IRB or regulatory agencies upon request.

Appendix E Principal Investigator Responsibilities When Relying on an External IRB

1. Obtain appropriate approvals from this institution prior to seeking review by another IRB.
2. Comply with determinations and requirements of the reviewing IRB.
3. Provide the reviewing IRB with requested information about local requirements or local research context issues relevant to the IRB’s determination prior to IRB review.
4. Notifying the reviewing IRB when local policies that impact IRB review are updated.
5. Cooperating in the reviewing IRB’s responsibility for initial and continuing review, record keeping and reporting and providing all information requested by the reviewing IRB in a timely manner.
6. Disclosing conflicts of interest as required by the reviewing IRB and complying with management plans that may result.
7. Promptly reporting to the reviewing IRB any proposed changes to the research and not implementing those changes to the research without prior IRB review and approval, except where necessary to eliminate apparent immediate hazards to the participants.
8. When enrolling participants, obtain, document and maintain records of consent for each participant or each participant’s legally authorized representative.
9. Promptly reporting to the reviewing IRB any unanticipated problems involving risks to participants or others according to the requirements specified in the reliance agreement.
10. Proving the reviewing IRB with data safety monitoring reports in accordance with the reviewing IRB’s reporting policy.
11. Reporting non-compliance, participant complaints, protocol deviations or other events according to the requirements specified in the reliance agreement.
12. Specifying the contact person and providing contact information for researchers and research staff to obtain answers to questions, express concerns, and convey suggestions regarding the use of the reviewing IRB.
References & Resources


Questions ?
Thanks!

Do you have any questions?
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