HARVARD LONGWOOD CAMPUS

HARVARD MEDICAL SCHOOL | HARVARD School of Dental Medicine | HARVARD SCHOOL OF PUBLIC HEALTH

ORARC Office of Regulatory Affairs & Research Compliance

Collaborative Research

and how to make it happen

Julie Chamberlin, MPH, CCRP, CIP
IRB Reliance & QA/QI Specialist
jchamberlin@hsph.harvard.edu

Meeting Objectives

Overview

Gain a basic understanding of what reliance is

Eligibility

Learn about what constitutes as eligible for reliance

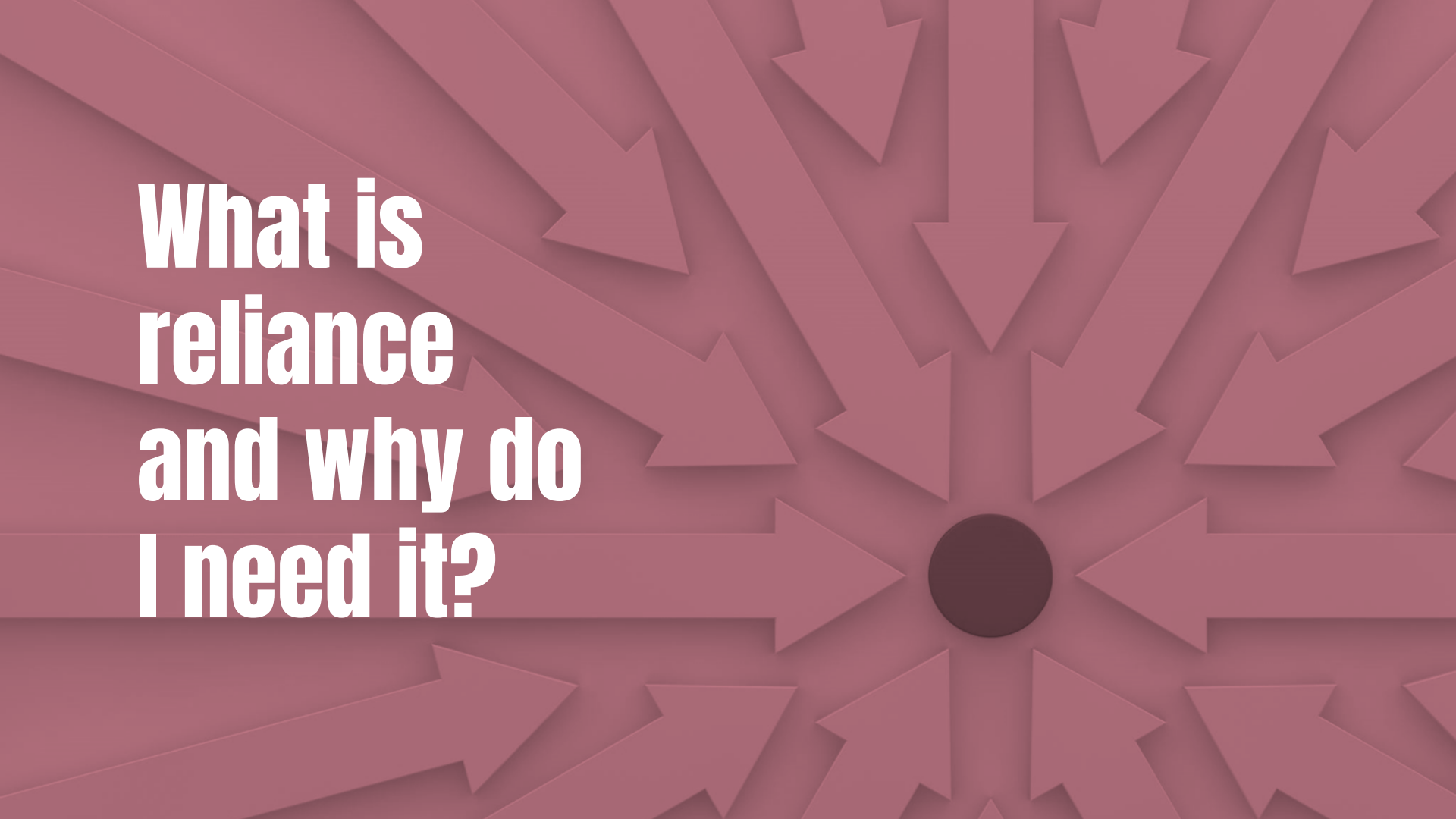
Execution & Responsibilities

Set-up Instructions / Lead site vs. Participaing site responsibilities

01

Reliance Overview

What is reliance and why do I need it?



Why do I need reliance?

NIH sIRB Policy

January 25, 2018

NIH funded multi-site studies involving **non-exempt** human subjects research

"**Same protocol**"– same research questions, involving same methodologies and outcomes

Revised Common Rule

January 20, 2020

"Cooperative Research"– more than one institution

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

45 CFR 46.114

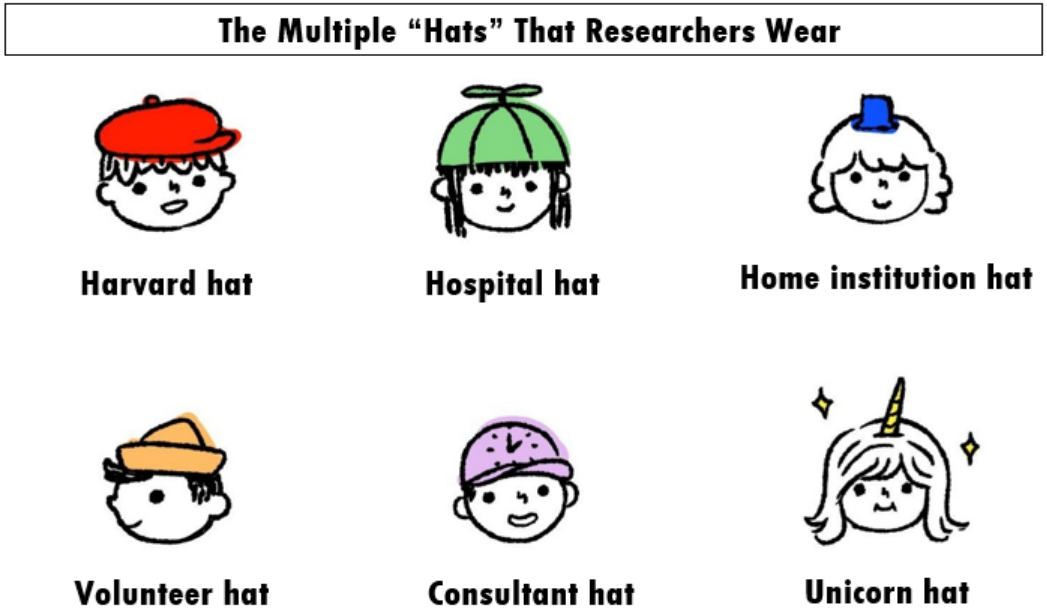
Reduce Burden

Always been the practice of choice

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)



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! ☺

02

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

5

Expedited

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

Reliance Eligible

6

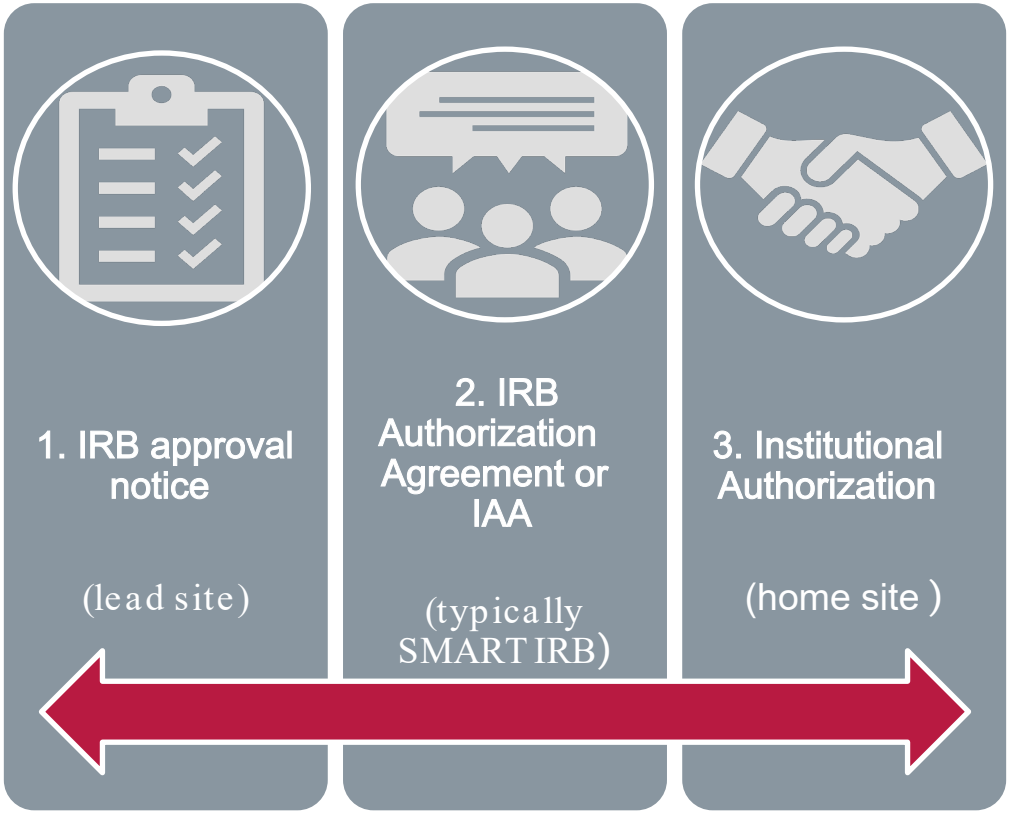
Convened IRB

Research involving human subjects that does not qualify for Exempt or Expedited review, typically involving greater than minimal risk to subjects.

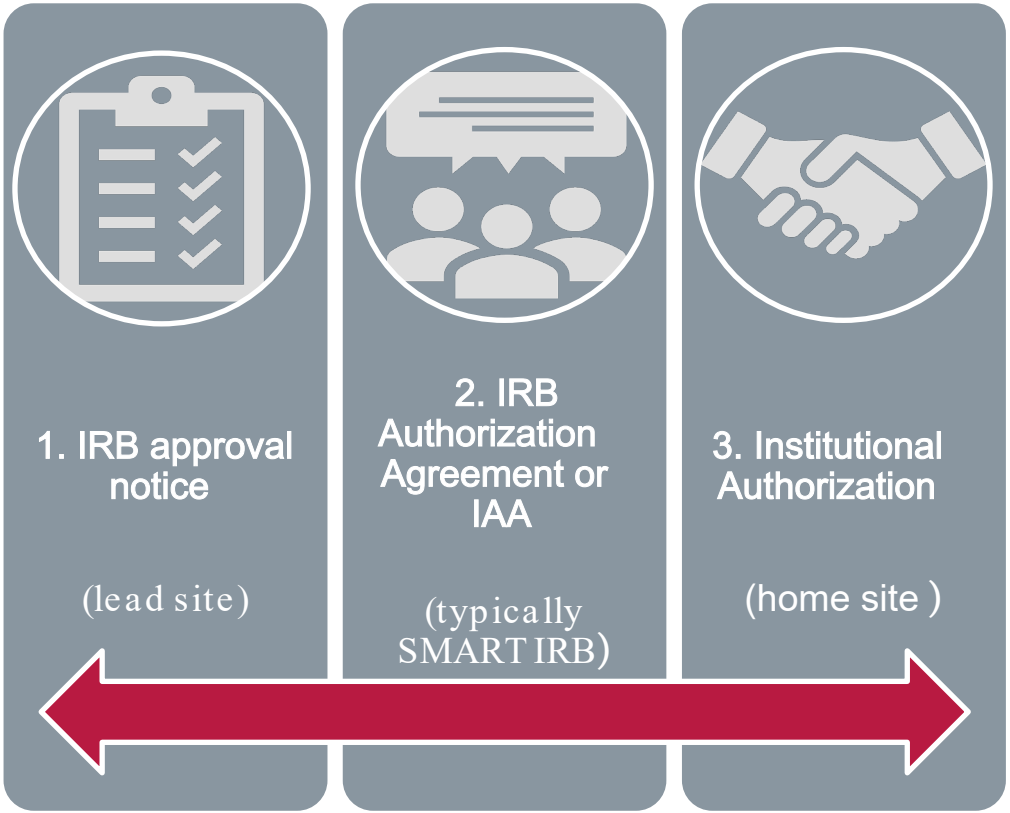
03

Reliance Execution

Three Essential Elements



Three Essential Elements



☐ **1. Obtain IRB approval from:**

_____

☐ **2. Obtain IAA**

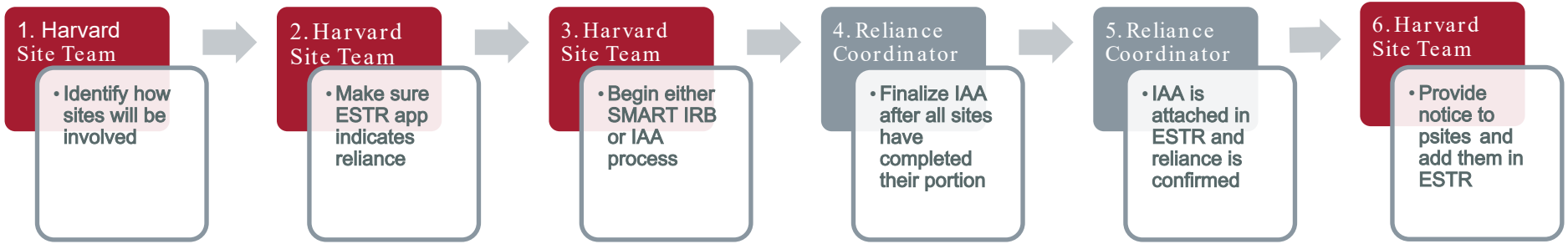
- ❑ SMART IRB # _ _ _ _
- \- OR -
- ❑ Traditional Form

☐ **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)



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.

2. Harvard Site Team

- Make sure ESTR app indicates reliance

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/

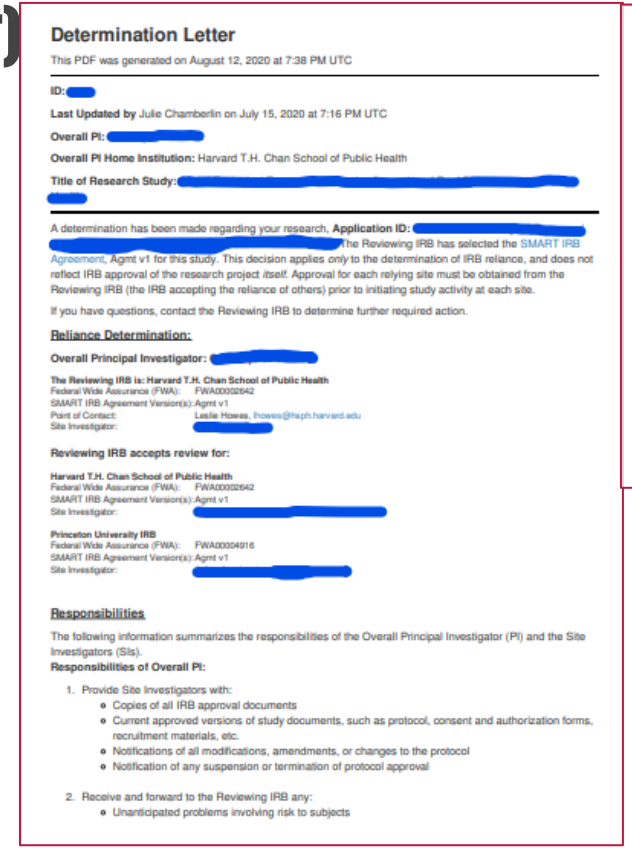
3. Harvard Site Team

- Begin either SMART IRB or IAA process

Harvard Serves as Lead IRB (Reliance Coordinator)

Steps 4 & 5

Reliance Coordinator finalizes IAA in SMART IRB and in ESTR



Determination Letter

This PDF was generated on August 12, 2020 at 7:38 PM UTC

ID: [redacted]

Last Updated by Julie Chamberlin on July 15, 2020 at 7:16 PM UTC

Overall PI: [redacted]

Overall PI Home Institution: Harvard T.H. Chan School of Public Health

Title of Research Study: [redacted]

A determination has been made regarding your research, **Application ID:** [redacted] The Reviewing IRB has selected the SMART IRB Agreement, Agmt v1 for this study. This decision applies *only* to the determination of IRB reliance, and does not reflect IRB approval of the research project *itself*. Approval for each relying site must be obtained from the Reviewing IRB (the IRB accepting the reliance of others) prior to initiating study activity at each site.

If you have questions, contact the Reviewing IRB to determine further required action.

Reliance Determination:

Overall Principal Investigator: [redacted]

The Reviewing IRB is: Harvard T.H. Chan School of Public Health
Federal Wide Assurance (FWA): FWA00002642
SMART IRB Agreement Version(s): Agmt v1
Point of Contact: Leslie Howes, lhowes@hsph.harvard.edu
Site Investigator: [redacted]

Reviewing IRB accepts review for:

Harvard T.H. Chan School of Public Health
Federal Wide Assurance (FWA): FWA00002642
SMART IRB Agreement Version(s): Agmt v1
Site Investigator: [redacted]

Princeton University IRB
Federal Wide Assurance (FWA): FWA00004916
SMART IRB Agreement Version(s): Agmt v1
Site Investigator: [redacted]

Responsibilities

The following information summarizes the responsibilities of the Overall Principal Investigator (PI) and the Site Investigators (SIs).

Responsibilities of Overall PI:

1. Provide Site Investigators with:
   - Copies of all IRB approval documents
   - Current approved versions of study documents, such as protocol, consent and authorization forms, recruitment materials, etc.
   - Notifications of all modifications, amendments, or changes to the protocol
   - Notification of any suspension or termination of protocol approval
2. Receive and forward to the Reviewing IRB any:
   - Unanticipated problems involving risk to subjects
   - Major deviations
   - Reports of noncompliance
3. Include in continuing review reports:
   - Information regarding subject recruitment
   - Progress report(s) from relying institution(s)

Responsibilities of Site Investigators:

1. Comply with protocol, amendments, and recruitment procedures as applicable and approved by the Reviewing IRB
2. Obtain informed consent as specified by Reviewing IRB, as applicable
3. Submit to Overall PI any:
   - Unanticipated problems involving risk to subjects
   - Major deviations
   - Reports of noncompliance, subject injuries, and subject complaints
   - Information regarding local variations in study conduct, such as subject recruitment, as requested
   - Progress reports, including summary of all enrolled subjects, screen failures, minor deviations, and all other information needed for continuing review, as applicable and in a timely fashion
   - Conflicts of interest of Site Investigators and site research personnel
4. In the event of a suspension or termination, stop research activity as instructed by Overall PI
5. In the event of an audit, allow the Overall PI and designees from the Reviewing IRB access to research related records

Please direct questions regarding this determination or your responsibilities as an Overall PI or SI to the Harvard T.H. Chan School of Public Health Point of Contact: Leslie Howes, lhowes@hsph.harvard.edu.

Thank you

4. Reliance Coordinator

- Finalize IAA after all sites have completed their portion

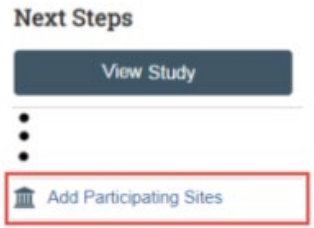
5. Reliance Coordinator

- IAA is attached in ESTR and reliance is confirmed

Harvard Serves as Lead IRB (Begin IAA process)

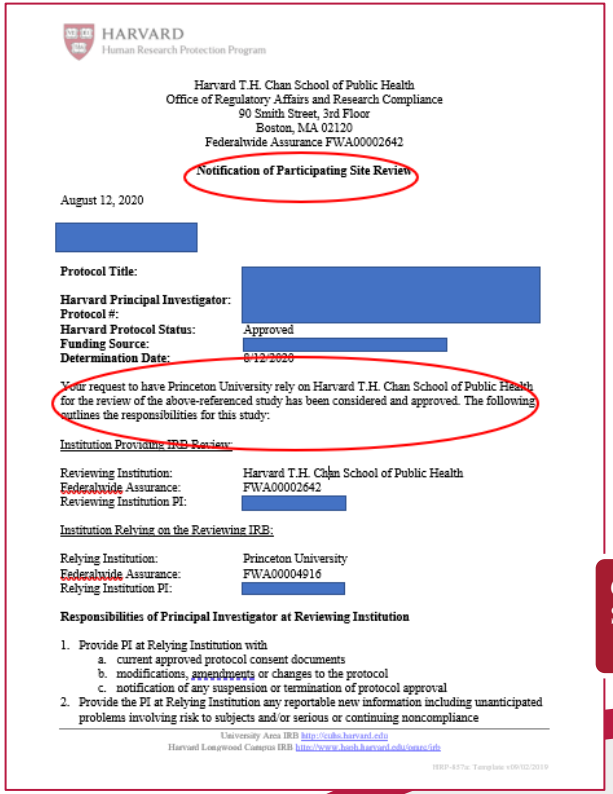
Step 6

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



HARVARD
Human Research Protection Program

Harvard T.H. Chan School of Public Health
Office of Regulatory Affairs and Research Compliance
90 Smith Street, 3rd Floor
Boston, MA 02120
Federalwide Assurance FWA00002642

Notification of Participating Site Review

August 12, 2020

[redacted]

Protocol Title: [redacted]
Harvard Principal Investigator:
Protocol #:
Harvard Protocol Status: Approved
Funding Source: [redacted]
Determination Date: 8/12/2020

Your request to have Princeton University rely on Harvard T.H. Chan School of Public Health for the review of the above-referenced study has been considered and approved. The following outlines the responsibilities for this study:

Institution Providing IRB Review:

Reviewing Institution: Harvard T.H. Chan School of Public Health
Federalwide Assurance: FWA00002642
Reviewing Institution PI: [redacted]

Institution Relying on the Reviewing IRB:

Relying Institution: Princeton University
Federalwide Assurance: FWA00004916
Relying Institution PI: [redacted]

Responsibilities of Principal Investigator at Reviewing Institution

1. Provide PI at Relying Institution with
   a. current approved protocol consent documents
   b. modifications, amendments or changes to the protocol
   c. notification of any suspension or termination of protocol approval
2. Provide the PI at Relying Institution any reportable new information including unanticipated problems involving risk to subjects and/or serious or continuing noncompliance

University Area IRB http://cuhs.harvard.edu
Harvard Longwood Campus IRB http://www.hms.harvard.edu/orasc/irb

HRP-837a: Template v08/02/2019

6. Harvard Site Team

- Provide notice to psites and add them in ESTR

Harvard is a Participating Site (aka Relying Site, pSite)

Harvard is a Participating Site (ESTR app)

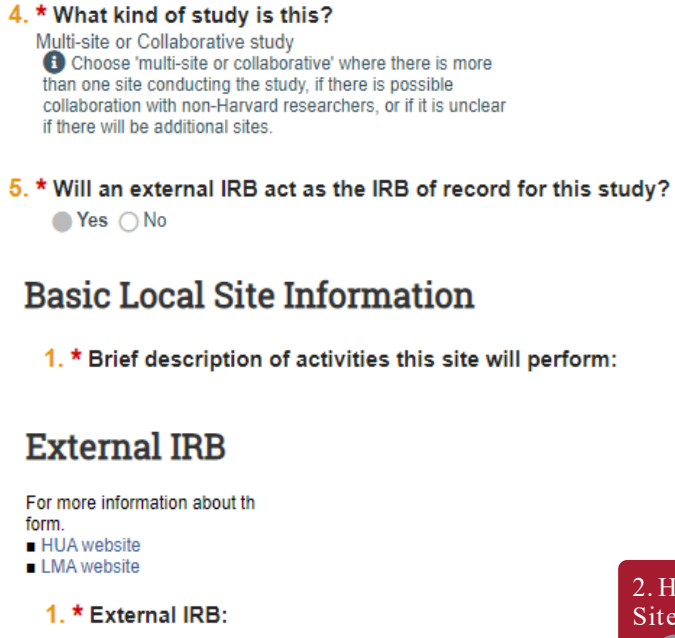
Step 2

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



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/

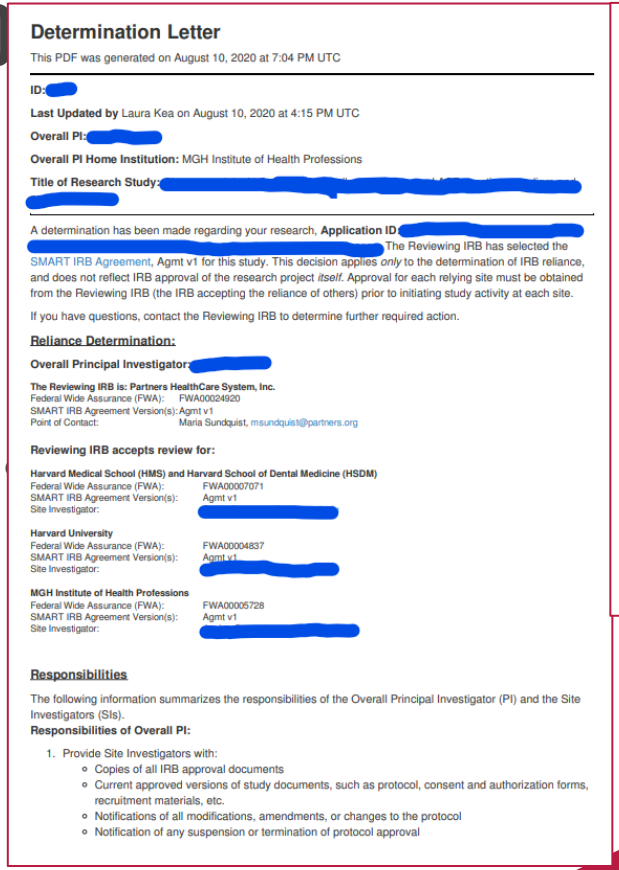
3. Harvard Site Team

- 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



Determination Letter

This PDF was generated on August 10, 2020 at 7:04 PM UTC

ID: [redacted]

Last Updated by Laura Kea on August 10, 2020 at 4:15 PM UTC

Overall PI: [redacted]

Overall PI Home Institution: MGH Institute of Health Professions

Title of Research Study: [redacted]

A determination has been made regarding your research, **Application ID** [redacted] The Reviewing IRB has selected the SMART IRB Agreement, Agmt v1 for this study. This decision applies *only* to the determination of IRB reliance, and does not reflect IRB approval of the research project *itself*. Approval for each relying site must be obtained from the Reviewing IRB (the IRB accepting the reliance of others) prior to initiating study activity at each site.

If you have questions, contact the Reviewing IRB to determine further required action.

Reliance Determination:

Overall Principal Investigator: [redacted]

The Reviewing IRB is: Partners HealthCare System, Inc.
Federal Wide Assurance (FWA): FWA00024920
SMART IRB Agreement Version(s): Agmt v1
Point of Contact: Maria Sundquist, msundquist@partners.org

Reviewing IRB accepts review for:

Harvard Medical School (HMS) and Harvard School of Dental Medicine (HSDM)
Federal Wide Assurance (FWA): FWA00007071
SMART IRB Agreement Version(s): Agmt v1
Site Investigator: [redacted]

Harvard University
Federal Wide Assurance (FWA): FWA00004837
SMART IRB Agreement Version(s): Agmt v1
Site Investigator: [redacted]

MGH Institute of Health Professions
Federal Wide Assurance (FWA): FWA00005728
SMART IRB Agreement Version(s): Agmt v1
Site Investigator: [redacted]

Responsibilities

The following information summarizes the responsibilities of the Overall Principal Investigator (PI) and the Site Investigators (SIs).

Responsibilities of Overall PI:

1. Provide Site Investigators with:
   - Copies of all IRB approval documents
   - Current approved versions of study documents, such as protocol, consent and authorization forms, recruitment materials, etc.
   - Notifications of all modifications, amendments, or changes to the protocol
   - Notification of any suspension or termination of protocol approval
2. Receive and forward to the Reviewing IRB any:
   - Unanticipated problems involving risk to subjects
   - Major deviations
   - Reports of noncompliance
3. Include in continuing review reports:
   - Information regarding subject recruitment
   - Progress report(s) from relying institution(s)

Responsibilities of Site Investigators:

1. Comply with protocol, amendments, and recruitment procedures as applicable and approved by the Reviewing IRB
2. Obtain informed consent as specified by Reviewing IRB, as applicable
3. Submit to Overall PI any:
   - Unanticipated problems involving risk to subjects
   - Major deviations
   - Reports of noncompliance, subject injuries, and subject complaints
   - Information regarding local variations in study conduct, such as subject recruitment, as requested
   - Progress reports, including summary of all enrolled subjects, screen failures, minor deviations, and all other information needed for continuing review, as applicable and in a timely fashion
   - Conflicts of interest of Site Investigators and site research personnel
4. In the event of a suspension or termination, stop research activity as instructed by Overall PI
5. In the event of an audit, allow the Overall PI and designees from the Reviewing IRB access to research related records

Additional Comments: Partners protocol 2013P001746

Please direct questions regarding this determination or your responsibilities as an Overall PI or SI to the Partners HealthCare System, Inc. Point of Contact: Maria Sundquist, msundquist@partners.org.

Thank you

4. Reliance Coordinator

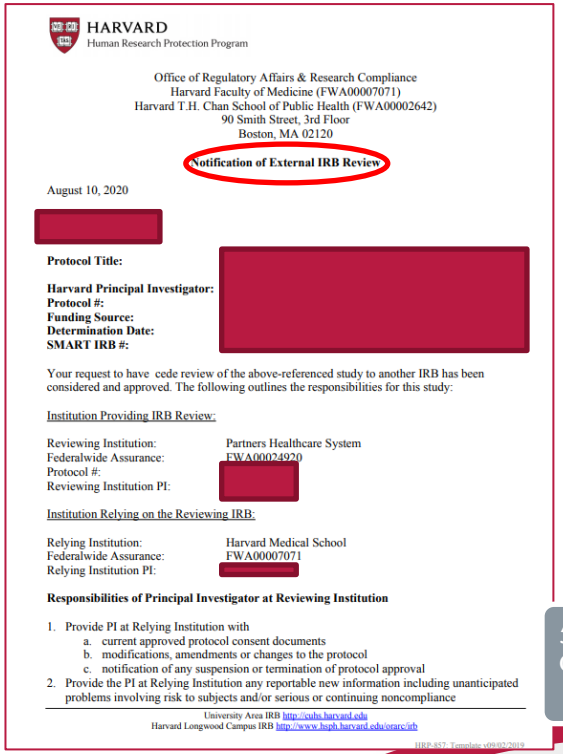
- Finalize IAA after all sites have completed their portion

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

ESTR Letter Example



HARVARD
Human Research Protection Program

Office of Regulatory Affairs & Research Compliance
Harvard Faculty of Medicine (FWA00007071)
Harvard T.H. Chan School of Public Health (FWA00002642)
90 Smith Street, 3rd Floor
Boston, MA 02120

Notification of External IRB Review

August 10, 2020

[redacted]

Protocol Title: [redacted]

Harvard Principal Investigator:
Protocol #:
Funding Source:
Determination Date:
SMART IRB #:

Your request to have cede review of the above-referenced study to another IRB has been considered and approved. The following outlines the responsibilities for this study:

Institution Providing IRB Review:

Reviewing Institution: Partners Healthcare System
Federalwide Assurance: FWA00024920
Protocol #:
Reviewing Institution PI: [redacted]

Institution Relying on the Reviewing IRB:

Relying Institution: Harvard Medical School
Federalwide Assurance: FWA00007071
Relying Institution PI: [redacted]

Responsibilities of Principal Investigator at Reviewing Institution

1. Provide PI at Relying Institution with
   a. current approved protocol consent documents
   b. modifications, amendments or changes to the protocol
   c. notification of any suspension or termination of protocol approval
2. Provide the PI at Relying Institution any reportable new information including unanticipated problems involving risk to subjects and/or serious or continuing noncompliance

University Area IRB http://cuhs.harvard.edu
Harvard Longwood Campus IRB http://www.hsph.harvard.edu/orarc/irb

HRP-857- Template v09/02/2019

5. Reliance Coordinator

- IAA is attached in ESTR and reliance is confirmed

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)

HARVARD T.H. CHAN SCHOOL OF PUBLIC HEALTH | HARVARD School of Dental Medicine | HARVARD MEDICAL SCHOOL

Appendix D Principal Investigator Responsibilities as Overall Site PI for sIRB 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. Ensuing 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.

Relying Site PI

- Appendix E (Investigators Manual)

HARVARD T.H. CHAN SCHOOL OF PUBLIC HEALTH | HARVARD School of Dental Medicine | HARVARD MEDICAL SCHOOL

Appendix E Principal Investigator Responsibilities When Relying on an External IRB

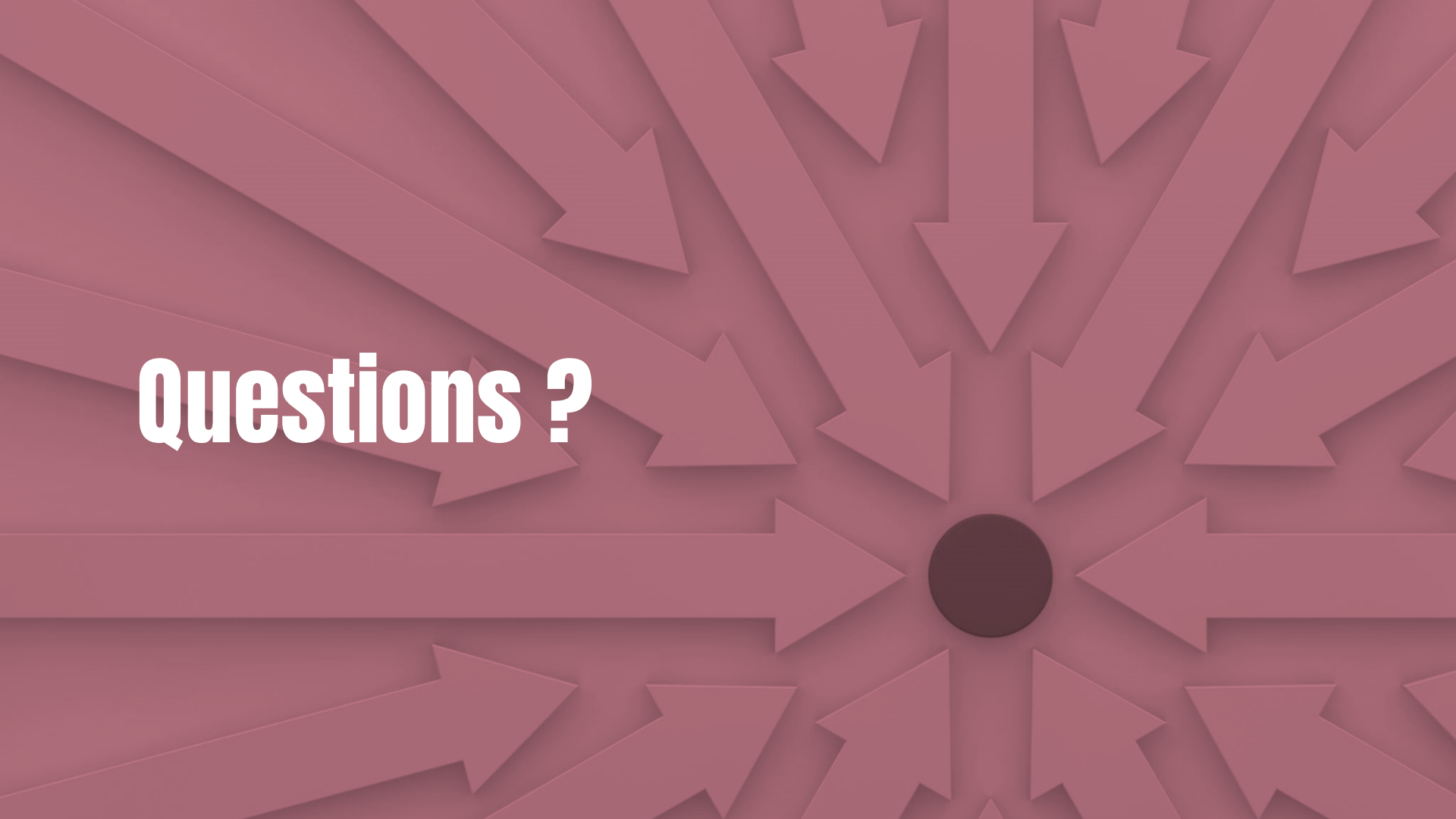
1. Obtain appropriate approvals from this institution prior to seeking review by another IRB.
2. Comply with determinations and requirements of the reviewing IRB.
3. Provide the reviewing IRB with requested information about local requirements or local research context issues relevant to the IRB's determination 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

Implementation of the sIRB policy. (2020). Retrieved August 13, 2020, from https://osp.od.nih.gov/clinical-research/implementation-of-the-sirb-policy/

https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-058.html

Hsantiag. (2017, June 27). Single IRB (sIRB) and External IRB: Reliance Arrangements. Retrieved August 19, 2020, from https://research.umn.edu/units/irb/how-submit/single-irb-sirb-and-external-irb-reliance-arrangements


Questions ?

Thanks!

Do you have any questions?
youremail@freepik.com
+91620 421838
yourcompany.com