WU Policy for use of a single IRB (sIRB) in multi-site research studies

Effective: **March 5, 2018**

Applicability: Washington University (WU) faculty, staff and students

Overview: This document describes the institutional policy for use of single IRB (sIRB) oversight in multi-site research studies.

Key Concepts:

- The WU Human Research Protection Program (HRPP) retains oversight of human subjects research conducted by WU faculty, staff and students.
  - As part of the WU HRPP, the WU IRB provides IRB review and oversight under the WU HRPP unless an alternate IRB has been approved through a formal written "reliance" agreement between WU and the alternate IRB.
  - The WU Human Research Protection Office (HRPO) acts as the administrative office for development and oversight of IRB reliance agreements.
  - The HRPO Executive Director is designated as the individual that will sign IRB Reliance Agreements on behalf of the Executive Vice Chancellor for Medical Affairs and Dean of the School of Medicine.
- IRB oversight for multi-site research studies may be provided via a sIRB model or with each site providing its own local IRB oversight.
  - All research that is federally funded and falls under the NIH sIRB Policy (effective January 25, 2018) must use a sIRB for the research conducted in the United States as designated in the funding application.
  - All research that falls under the DHHS regulations related to Cooperative Research (45 CFR 46.114 when effective) must use a sIRB for the research that is conducted in the United States.
  - For multi-site studies where WU would be the Prime Awardee, the WU researchers must apply to HRPO for institutional approval of their plan for sIRB oversight prior to submission of a funding application or initiation of agreements with multi-site participating entities.
  - The PI of a multi-site study for which WU serves as the reviewing IRB or is the relying institution must be a full-time, permanent employee (faculty or staff) or have received an exception approval from the WU Institutional Official. Research where an undergraduate student is the PI will not be considered for an exception approval. The sIRB of record has final authority to determine whether the proposed PI and the research staff are qualified to conduct and oversee the research.
- If the designated sIRB reviews and disapproves the research, the research cannot be deferred to any other IRB for review.
- All protocols for research performed at Washington University must be provided to HRPO by submission through the myIRB system, whether or not the WU IRB is acting as the sIRB for the research.
- When researchers rely on an outside sIRB, HRPO will generally exempt researchers from duplicative reporting. However, reports of certain serious adverse events, including unexpected participant deaths or unexpected events that are at least possibly related to the research and that may result in

permanent or long-term disability must be made by the WU researcher to both the WU IRB and the reviewing sIRB.
- The WU PI or the WU PI's department is responsible for guaranteeing payment of fees associated with use of a sIRB model, prior to submission to the WU IRB or external sIRB.

Special Considerations for Use of sIRB Models

When WU enters into an agreement to rely on an external sIRB there are differing impacts on the WU IRB and the WU administrative infrastructure. While the need for some local IRB meetings may decrease as full board reviews are undertaken by an outside sIRB, many important administrative functions remain at WU including:

- Negotiation of the reliance agreements
- Management and compliance with terms of the agreement
- Coordination, management, and liaison activities with outside sIRBs and their administrative infrastructures
- Development and implementation of new policies, procedures, workflows, and regulatory documentation specific to each reliance relationship (i.e each new sIRB.)
- Administration of financial activities related to both the role of a relying institution and a reviewing sIRB.
- Continued responsibility for the oversight and conduct of the research at the local site.
- Tracking and institutional response to unexpected serious adverse events that are at least possibly related to the research.
- Education and support of researchers to enable compliance with the variety of sIRB policies and procedures under which they will operate in the sIRB model.
- Education of WU researchers and staff to enable them to utilize outside sIRBs.

WU sIRB Decision Matrix for Use of sIRB:

The WU sIRB Decision Matrix (Figure 1) provides the options available at WU for identifying an appropriate sIRB for multi-site research. It is important that researchers contact HRPO as soon as they become aware that an sIRB model is a possibility for their research study or program to obtain consultation on choice of sIRB. The procedures for initiating use of a sIRB vary depending on the type of funding and WU role on the project. Regardless of whether the WU IRB will serve as the reviewing IRB, or if the institution will be relying on an outside sIRB for research, all research must first be submitted for review through the myIRB system.

- Research where WU IRB will serve as the sIRB requires submission of a protocol application by the lead PI plus a "site" application submitted by each participating site.
- Research where WU is relying on an outside sIRB requires that a "Request to Rely" (RTR) application be submitted and approved by HRPO prior to protocol submission to any outside sIRB.

Decision Matrix:

The sIRB Decision Matrix provides information about which sIRBs may be used for multi-site studies depending on the funding source and the researcher role on the project. In general, the WU IRB will have "right of first refusal" for oversight of multi-site research where WU receives the prime funding award and/or is the lead investigator or has developed the protocol. For studies where WU is not the prime awardee, the decision of which entity will provide sIRB services is typically determined by the prime awardee in collaboration with the research funding entity.

NIH Sponsored Research:

In general, WU IRB will serve as the Reviewing IRB for NIH-sponsored studies with a WU Prime Awardee. However, use of another sIRB may be approved by HRPO under specific circumstances.

Industry Sponsored Research:

Researchers who are a participating site on an industry-sponsored study may use a WU approved independent IRB for oversight of the WU site. The research team must submit and receive approval of a "Request to Rely" (RTR) application through the WU myIRB system to initiate reliance on one of the approved independent IRBs. A listing of WU approved independent IRBs is available on the HRPO website.

- A HRPO administrative fee will be assessed at the time of initial submission and annually based on the fee schedule posted on the HRPO website. It is the responsibility of the WU principal investigator and his/her Department to pay the applicable fees.
- The initial fee is payable at the time of initial submission in the myIRB system. The RTR will not be approved until either the HRPO fee is paid in full, or an authorized Department Official attests on the RTR form that the Department takes responsibility for paying the fee. In the latter case, the Department will be invoiced for the fee immediately after RTR approval.
- The annual fees are payable on the anniversary date of the original approval until the study is closed with the sIRB.

Developing a grant budget:

The HRPO sIRB contact (see below) provides budgeting information for grant proposals to use the WU IRB as the sIRB. Fees are based on an annual fee schedule that accounts for the funding source, number of sites, length of the research project, and other factors. The sIRB Fee Schedule may be adjusted on an annual basis. WU recognizes that sIRB fees may change between the time that the grant is submitted and the time of award. The sIRB budget and associated per site fees may be adjusted at the time of grant award to account for the current annual fee schedules and any change in number of participating sites. The PI should consult with the HRPO sIRB contact as soon as a Just-In-Time notice is received to determine the final fee schedule.

HRPO sIRB Contact: https://hrpo.wustl.edu/contact/

Key Terms:

IRB	An Institutional Review Board is a committee charged with providing regulatory oversight for research involving human subjects.
sIRB	A single IRB, also termed "central" IRB. An IRB that provides IRB review and oversight for two or more participating sites in multi-site research. The IRB may be associated with an academic, private, non-profit, or commercial entity.
Reliance Agreement	A written agreement between entities participating in multi-site research. The agreement contains terms that describe what each entity is responsible for in the review, oversight, and conduct of the research including responsibilities related to local requirements, state law, and federal regulations. Previously these were referred to as IAAs or "IRB Authorization Agreements."
Reviewing IRB	A term used in Reliance Agreements to identify the party to the agreement that acts as the sIRB in providing IRB review for all sites participating in the conduct of the same multi-site protocol.
Relying Institution	A term used in Reliance Agreements to identify the party to the agreement that will rely on an IRB outside of its own entity. This is sometimes termed the Relying Institution or Relying Site or Participating Site.

Figure 1: WU sIRB Decision Matrix

This table should be used to determine which type of sIRB is appropriate under this policy depending on the funding source and the WU role on the research.

- *When WU is considered for acting as the sIRB (see column titled "WU IRB") or another non-commercial IRB (see column "IRB at Another Entity"), researchers must first obtain agreement from HRPO to use the requested sIRB.*
- *WU has pre-approved some independent (commercial) IRBs that researchers may use. (See "Independent (Commercial) IRB") Pre-approved IRBs are listed on the HRPO website. Other commercial IRBs may be approved on a case-by-case basis.*

Funding Source	WU Role	Consideration in choosing the sIRB	What are Possible sIRB Options?		
			WU IRB	IRB at Another Entity*	Independent (Commercial) IRB
Federally funded under NIH sIRB Policy (includes SBIR/STTR)	Prime Awardee	The WU IRB will be considered as having right of first refusal for the role of sIRB. However, a decision will be made on a case-by-case basis depending on the costs of sIRB review, number, type, and location of sites, complexity of the protocol, current capacity of the WU IRB, and ability to meet study review timelines.	Yes	Yes	Yes
	WU Participating Site	The Lead PI/Site will be responsible for identifying the entity to serve as the sIRB in the grant submission. This may involve consultation with other participating sites at the time of grant submission, or may be determined after award. If WU is considered as the sIRB, the same criteria under the Prime Awardee section would be assessed.	Yes	Yes	Yes

Funding Source	WU Role	Consideration in choosing the sIRB	sIRB Options		
			WU IRB	IRB at Another Entity*	Independent (Commercial) IRB
For-Profit	Local Principal Investigator Initiated	The WU IRB will be considered as having right of first refusal for the role of sIRB. However, a decision will be made on a case-by-case basis depending on the costs of sIRB review, number, type and location of sites, complexity of the protocol, current capacity of the WU IRB, and ability to meet study review timelines. Funding must be provided to WU to act as the sIRB for participating sites.	Yes	Yes	Yes
	Outside Investigator Initiated WU Participating Site	WU will consider relying on another academic site that is AAHRPP accredited or meets equivalent standards. However, a decision will be made on a case-by-case basis depending on the requirements of the study to use a sIRB, and the complexity and risks of the study.	No	Yes	Yes
	For-Profit Initiated WU Participating Site		No	Yes	Yes

Funding Source	WU Role	Consideration in choosing the sIRB	sIRB Options		
			WU IRB	IRB at Another Entity*	Independent (Commercial) IRB
Non-Profit/Private	Local Principal Investigator Initiated	The WU IRB will be considered first for the sIRB. However, a decision will be made on a case-by-case basis depending on the costs of sIRB review, number, type and location of sites, complexity of the protocol, current capacity of the WU IRB, and ability to meet study review timelines. Funding must be provided to WU to act as the sIRB for participating sites.	Yes	Yes	Yes
	Outside Investigator Initiated Participating Site	WU will consider relying on another academic site that is AAHRPP accredited or meets equivalent standards. However, a decision will be made on a case-by-case basis depending on the requirements of the study to use a sIRB, and the complexity and risks of the study.	Yes	Yes	Yes
	Non-Profit/Private Initiated WU Participating Site		No	Yes	Yes
No Funding	Local Principal Investigator Initiated	Because there is no funding, this type of study will most likely not use a sIRB model. The WU IRB will act as the IRB for the local site only in most cases and each site would remain responsible for its own IRB review. WU will consider relying on another academic site that is AAHRPP accredited or meets equivalent standards. However, a decision will be made on a case-by-case basis depending on the requirements of the study to use a sIRB, and the complexity and risks of the study.	No	Yes	No
	Outside Investigator Initiated WU Participating Site		No	Yes	No

* May be another academic site, a private entity, etc.