

Single IRB Standard Best Practices

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Video

• In an ideal sIRB world, all NIH funded research starts quickly - there is an efficient IRB review process, where information – data and documents are exchanged electronically from an sIRB to a participating site just as if they were ONE institution. Research teams experience an ease of submission using an interconnected system without double entry; Institutions have all the necessary information to track research their sponsored research. IRBs achieve consensus on standardized approaches to protocol and consent documentation, reliance agreements and ancillary review processes. In this sIRB world research begins



The Current Real World sIRB: Far From Ideal

State
(Post sIRB
Policy)

Current

Common IRB Best Practices Do Not Exist Established Systems of Communications Do Not Exist

Redundant Incompatible sIRB Processes Manual Data Entry, Double Entry - resulting in errors

PI's, IRBs and Sites out of compliance Miss data and documents to track important NIH Research

Researchers have to navigate IRBs varied requirements Lacking confidence across IRBs and Institutions

Potential Outcomes

End Result

Inefficiency

Weakened Protections



Wasted Time & Resources

NYU Langone Health



Building A Unified Approach Enhance and streamline IRB review for multi-site research Maintain high Eliminate standard for human system inefficiencies subjects protections Unified Approach Allow Reduce research to administrative proceed burden effectively and expeditiously Eliminate unnecessary duplicative study docs

entry



Building on Existing Solutions

Existing Solutions

SMART IRB recommendations, guidance and reliance templates

Support primarily the Clinical and Translational Science Award (CTSA) network

To date, work has been mostly delivered by large institutions

Web-Based Submission System

Our Goals

Standardizing Additional Documents, Policies and Processes

Support All NIH Award networks

Promote collaboration across institutions of all sizes

End-to-End Cloud Service Connecting sIRB and pSites for Multi-site Studies











Our Philosophy

Representation

 Obtained input from many institutions of various sizes

Consensus

 Worked collaboratively to identify optimized solutions

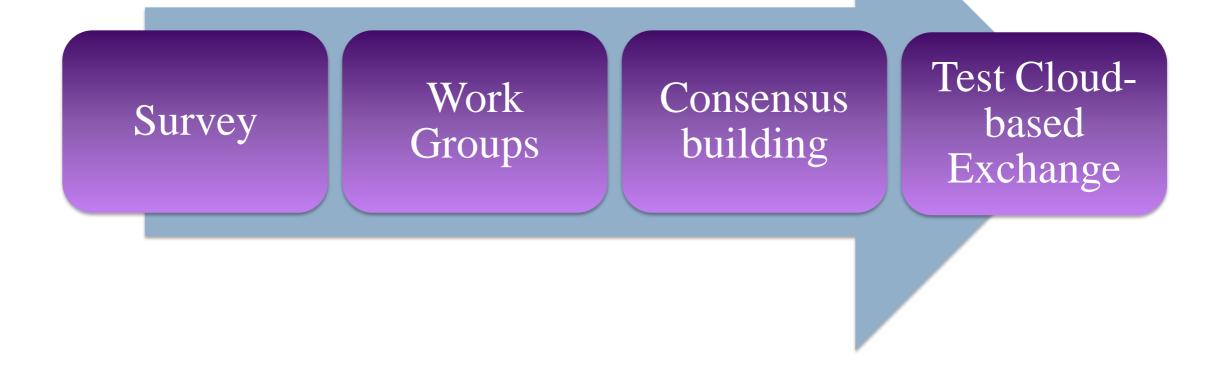
Standardization

 Agreed on standardized best practices, policies and documents





Establishing consensus for best practices



Initial REDCap Survey: Community engagement

What was asked?

- characteristics of research institution
- staffing and review volume
- current local IRB data management practices
- resources or experience for sIRB model
- electronic IRB submission platform
- standardization preferences on range of review topics in a main site and p-site context:
 - Informed Consent
 - Reliance agreements
 - Reportable Information
 - Ancillary Reviews

Who responded?

- 122 volunteers from 105 unique institutions
- range of sizes and capabilities, including non-CTSA institutions
- sites not on a Huron e-submission system, including homegrown systems

• When?

-01/26/2018 - 02/28/2018





Survey Terminology

Category of Approaches

- Standard the relying institution will accept standardized
 language/forms/processes with no local IRB/Institutional review
- Hybrid the relying institution will accept some standardized language/forms/processes but with option of limited IRB/Institutional changes
- Local the relying institution requires IRB/Institutional review of all language/forms/processes and would rarely approve a standardized (unmodified) study-wide instrument



Survey Topics and Results

- Informed Consent Language
 - Confidentiality of records
 - Experimental procedures
 - Subject renumeration
 - Risks related to genetics research
 - Research statement
 - NIH CoC Statement
 - Benefits to the subject
 - In case of injury explanation
 - Privacy Protection
 - Purpose of research
 - Alternate procedures and courses of treatment
 - Risks of discomforts to the subject
 - Duration of participation

- Study Team Training & Qualification
- Data Safety Monitoring Plan
- Recruitment Materials
- Definition of Vulnerable Populations
- Financial Conflict of Interest
- Defining IRB Reportable Events & Time Frames (including Subject Complaints)
- Defining ancillary reviews, timing of ancillary reviews
 - Outcomes of ancillary reviews and process for re-reviews
- Process and Addendum for Reliance Agreement
- Reliance Agreement and Addendum

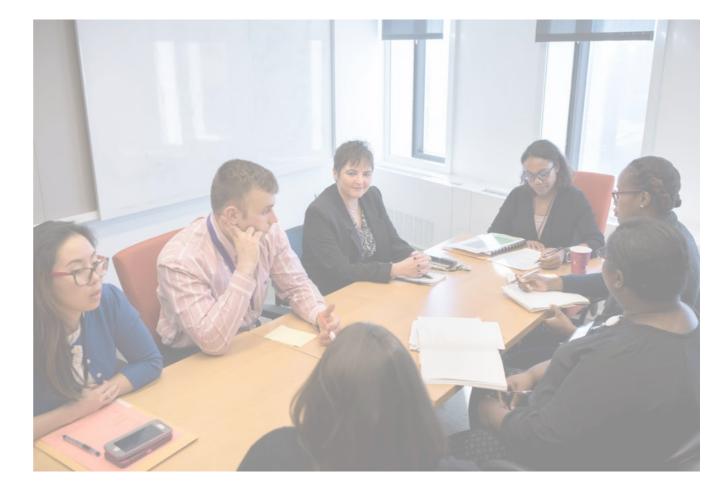


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Building Consensus: Work Groups - Expertise, Representation

• 5 Work Groups

- Survey participants
- Members from institutions of various sizes
- CTSA and non-CTSA
- Bi-weekly via teleconference over several months
- Informed by the survey results, worked to determine consensus for best practices for each major topic





Work Groups – Expertise, Representation

Informed Consent

Frederick More - NYU Langone Health

Helen Panageas - NYU Langone Health

Rania AlShahrouri - UT Southwestern Medical Center

Brian Moore - Wake Forest University Health Sciences

Julie Ozier - Vanderbilt University Medical Center

John Roberts - UNC Chapel Hill

Vanessa Smith - Rockefeller University

Lorena Smith - University of California San Diego

Amy Waltz - Indiana University

Daniel Jones - Partners Healthcare

Ancillary Review

Erik Mann - NYU Langone Health

Nida Cassim - NYU Langone Health

Karen Allen - University of California, Irvine

Hallie Kassan - Northwell Health

Kimberly Summers - University of Texas Health San Antonio

Elizabeth Witte - Harvard Medical School

Reliance Agreement

David Wallach – NYU Langone Health

Rui Ferreira - Albert Einstein College of Medicine

Raffaella Hart – BRANY

Thomas Street - University of Miami

Aaron Kirby - Harvard Catalyst

Other IRB Documents/Definitions

Marina Godina - NYU Langone Health

Kira Nightingale - NYU Langone Health

Catherine Raimond - NYU Langone Health

Aaron Kirby - Harvard Catalyst

Adrienne Meyer - University of Washington

Kelley O'Donoghue - University of Rochester

Sujatha Sridhar - University of Texas Health Science Center at Houston

Jenni Beadles - Vanderbilt University Medical Center

Ryan Washington - BRANY IRB

Reportable Information

Nadia Johnson – NYU Langone Health

Jessica Evans - Ohio State University

Nancy Green - Columbia University Medical Center

Stefanie Juell - Albert Einstein College of Medicine

Ginger Pomiecko - University Hospitals of Cleveland

Brenda Ruotolo - Columbia University

Megan Singleton - Johns Hopkins University School of Medicine

Nichelle Cobb - University of Wisconsin

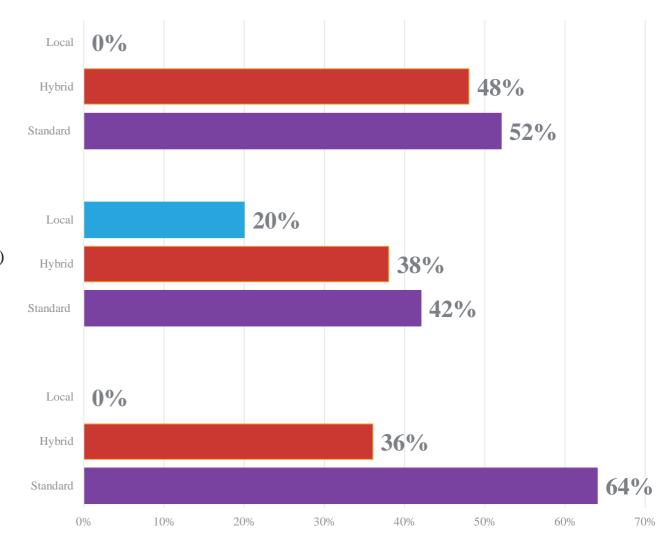
Vanessa Hill - Ohio State University



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Work Group Results Summary

- Produced Suggested Approaches for Standardization:
 - Informed Consent templates (*shown on right*)
 - Biomedical and non-biomedical versions
 - Other IRB Documents/Definitions
 - Study Team Training and Qualifications (shown on right)
 - Data Safety Monitoring Plan
 - Recruitment Materials
 - Reportable Information
 - Reporting Definitions (*shown on right*)
 - Processing of Reporting and timelines
 - Review Process for Reportable Events



■ Full sIRB Standardization

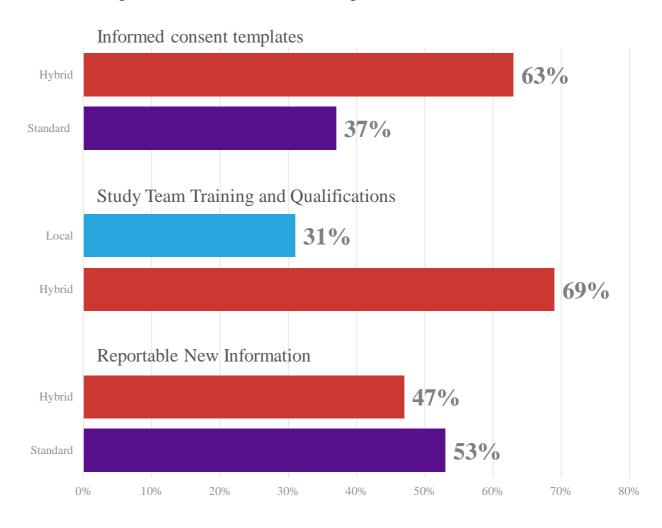


Significant Local Modifications



Consensus Building: REDCap Survey Preliminary Results

- IRB community asked to choose from top two approaches as determined by work groups
 - IRB forum
 - CTSAs
 - Huron Listsery
 - NYC IRB Consortium Listserv
- 65 responses from 45 different institutions
 - Survey still open for participation



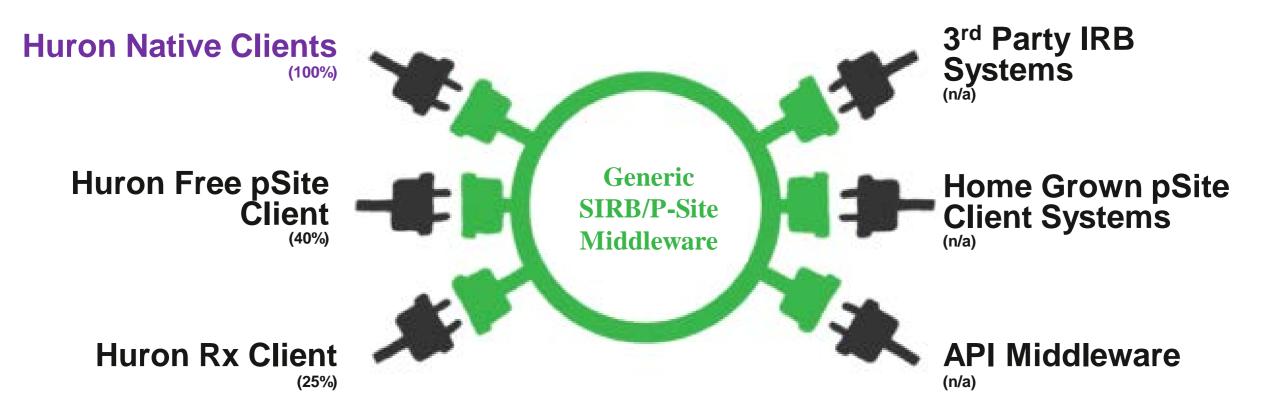






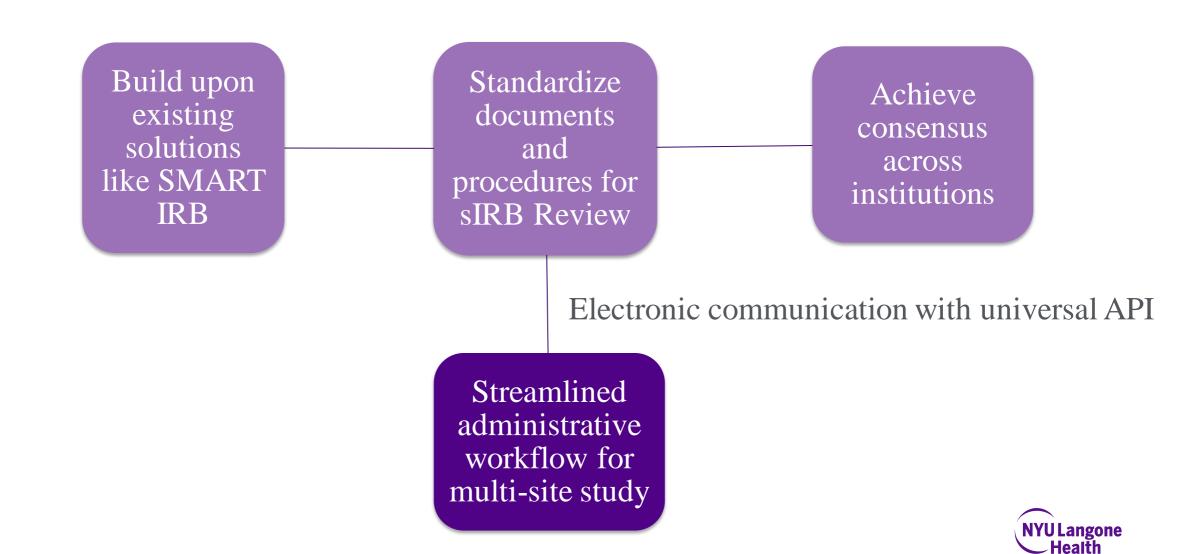
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Generic SIRB/P-Site Middleware





Impact for the sIRB model



Impact: Dissemination and Sharing of Results

- sIRB Alliance and next steps
 - Publish all consensus documents to sIRB Alliance website
 - Create Public Access Forum for ongoing dialogue
 - Create universal API for exchanging sIRB/pSite information between different IRB administrative systems (currently in draft)
- Standardize Best Practices to expand the exisitng SMART IRB's standard template for reliance agreements and broaden to the concept of harmonization for sIRB efficiency for all study related document review.

