Intricacies of the IRB Application

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The Institutional Review Board

- Primary responsibility: to protect the rights and welfare of human research participants
- Two most important documents that IRBs are commissioned to follow:
  - Code of Federal Regulations Title 45 Part 46
    - DHHS - Office of Human Research Protections (OHRP)
  - Belmont Report
    - Established the responsibility of the investigator to submit research activity for review by an Institutional Review Board (IRB)
    - Respect for Persons, Beneficence, Justice
- Additional provisions:
  - Food and Drug Administration (FDA) regulated research
    - 21 CFR 50, 56
  - Written Procedures/Policies
    - Institutional level

Criteria for IRB Approval
45 CFR 46.111

a) In order to approve research covered by this policy the IRB shall determine that all of the following requirements are satisfied:
   1) Risks to subjects are minimized.
   2) Risks to subjects are reasonable in relation to anticipated benefits, if any, to subjects, and the importance of the knowledge that may reasonably be expected to result.
   3) Selection of subjects is equitable.
   4) Informed consent will be sought from each prospective subject or the subject's legally authorized representative, in accordance with, and to the extent required by §46.116.
   5) Informed consent will be appropriately documented, in accordance with, and to the extent required by §46.117.

Criteria for IRB Approval
45 CFR 46.111

6) When appropriate, the research plan makes adequate provision for monitoring the data collected to ensure the safety of subjects.

7) When appropriate, there are adequate provisions to protect the privacy of subjects and to maintain the confidentiality of data.

b) When some or all of the subjects are likely to be vulnerable to coercion or undue influence, such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons, additional safeguards have been included in the study to protect the rights and welfare of these subjects.

Do I need IRB oversight?

- Research – a systematic investigation designed to develop or contribute to generalizable knowledge.
- Human Subjects - A living individual about whom an investigator obtains data through intervention or interaction or obtains identifiable private information.
- OHRP Decision Charts: http://www.hhs.gov/ohrp/policy/checklists/decisioncharts.html

Review Types

- Exempt, Expedited or Full Board
- Minimal risk does not automatically qualify a study for expedited or exempt review
  - Must meet the criteria found in the federal regulations and OHRP guidance
- Expedited/exempt does not always guarantee your study will be reviewed faster
- Take into consideration your study population(s) and the procedures taking place in your study
  - Prisoners, Children, Fetuses, Cognitively Impaired, Deception

45 CFR 46; 21 CFR 56; and http://www.hhs.gov/ohrp/policy/expedited98.html

IRB Pre-review

- Consistency
  - IRB Application=Protocol=Consent Documents=Grant=Study Instruments=Recruitment Materials
- Regulations
  - Consent form has all required elements
  - Safeguards are in place for vulnerable populations
- Institutional Policies
  - Recruitment Materials
  - Protocol Guidelines

IRB Review
Required Supporting Documents

- Protocol
- All Informed Consent documents/scripts
- Surveys/Questionnaires
- Interview Scripts
- Focus Group Questions
- Recruitment Materials (flyers, emails, brochures)
- FDA documents (indicating IND or IDE number)
- Investigator's Brochures and/or package inserts
- Video scripts
- Letters of support from Non-USF sites
- Approval letters from host country for transnational research
- Any other study instruments being used

Protocol

- Project Title
- Principle Investigator
- Study staff (if required)
- Background and Rationale
- Purpose
- Objectives
- Research questions
- Sample size and statistical justification
- Expected results (audience)
- Risks
- Benefits
- Methodology
- Informed Consent Process
- Additional safeguards – vulnerable populations
- Privacy/confidentiality
- Data and safety Monitoring (greater than minimal risk)
- References

Informed Consent

Basic elements per 45 CFR 46.116(a)

- (1) A statement that the study involves research, an explanation of the purposes of the research and the expected duration of the subject's participation, a description of the procedures to be followed, and identification of any procedures which are experimental;
- (2) A description of any reasonably foreseeable risks or discomforts to the subject;
- (3) A description of any benefits to the subject or to others which may reasonably be expected from the research;
- (4) A disclosure of appropriate alternative procedures or courses of treatment, if any, that might be advantageous to the subject;
- (5) A statement describing the extent, if any, to which confidentiality of records identifying the subject will be maintained;

Informed Consent
Basic elements per 45 CFR 46.116(a)

- (6) For research involving more than minimal risk, an explanation as to whether any compensation and an explanation as to whether any medical treatments are available if injury occurs and, if so, what they consist of, or where further information may be obtained;
- (7) An explanation of whom to contact for answers to pertinent questions about the research and research subjects' rights, and whom to contact in the event of a research-related injury to the subject; and
- (8) A statement that participation is voluntary, refusal to participate will involve no penalty or loss of benefits to which the subject is otherwise entitled, and the subject may discontinue participation at any time without penalty or loss of benefits to which the subject is otherwise entitled.

Informed Consent

Additional elements per 45 CFR 46.116(b)

- (1) A statement that the particular treatment or procedure may involve risks to the subject (or to the embryo or fetus, if the subject is or may become pregnant) which are currently unforeseeable;
- (2) Anticipated circumstances under which the subject's participation may be terminated by the investigator without regard to the subject's consent;
- (3) Any additional costs to the subject that may result from participation in the research;
- (4) The consequences of a subject's decision to withdraw from the research and procedures for orderly termination of participation by the subject;
- (5) A statement that significant new findings developed during the course of the research which may relate to the subject's willingness to continue participation will be provided to the subject; and
- (6) The approximate number of subjects involved in the study.

Waiver of Informed Consent Process

- 45 CFR 46.116(c)
  - An IRB may approve a consent procedure which does not include, or which alters, some or all of the elements of informed consent set forth above, or waive the requirement to obtain informed consent provided the IRB finds and documents that:
    - (1) The research or demonstration project is to be conducted by or subject to the approval of state or local government officials and is designed to study, evaluate, or otherwise examine: (i) public benefit or service programs; (ii) procedures for obtaining benefits or services under those programs; (iii) possible changes in or alternatives to those programs or procedures; or (iv) possible changes in methods or levels of payment for benefits or services under those programs; and
    - (2) The research could not practicably be carried out without the waiver or alteration.

Waiver of Informed Consent Process

- 45 CFR 46.116(d)
  - (1) The research involves no more than minimal risk to the subjects;
  - (2) The waiver or alteration will not adversely affect the rights and welfare of the subjects;
  - (3) The research could not practicably be carried out without the waiver or alteration; and
  - (4) Whenever appropriate, the subjects will be provided with additional pertinent information after participation.

Waiver of Informed Consent Process

- For IRB Application
  - Must justify how the research cannot be practically be carried out without the waiver of informed consent
  - Typically used for retrospective collection of data/specimens

Waiver of Documentation of Informed Consent

- 45 CFR 46.117(c)
  - (1) That the only record linking the subject and the research would be the consent document and the principal risk would be potential harm resulting from a breach of confidentiality. Each subject will be asked whether the subject wants documentation linking the subject with the research, and the subject's wishes will govern; or
  - (2) That the research presents no more than minimal risk of harm to subjects and involves no procedures for which written consent is normally required outside of the research context.

Waiver of Documentation of Informed Consent

- Consent process still takes place
- You will not obtain signatures
- Informed Consent document/script still needed
- Justify in IRB application
- Typically used for research involving surveys, interviews, and/or questionnaires

Recruitment Materials

- Seen as beginning of informed consent process
- Three primary means of recruitment
  - Investigator's own patients
  - Referred by another physician
  - Advertising
- See specific institutional policies

Recruitment Materials
Do's

- Provide copies of all recruitment materials to the IRB for review
- What to include:
  - Name and contact information of the investigator
  - Name of institution or logo
  - State it is "research"
  - Brief purpose of research
  - Time commitment
  - Compensation
  - Potential benefits
- Use lay language
- Adapt to type of advertisement
  - More information can be provided on a flyer than on an internet banner

Recruitment Materials
Do not's

- Don't state compensation as a benefit
- Don't simply state drug/device/procedure is safe and/or effective for purpose of investigation
- Should not imply drug/device/procedure is superior to others
  - Don't use terms such as "new treatment" or "new medication" (may lead to therapeutic misconception)
- Promise "free medical treatment" when intent is only that patients won't be charged for participation
- Do not **overemphasize** the compensation amount

Vulnerable Populations

- Special considerations and safeguards required
- May constitute full board review
- The following categories must meet federal criteria for approval
  - Pregnant Women/Fetuses/Neonates
    - 45 CFR 46 Subpart B
  - Prisoners
    - 45 CFR 46 Subpart C
  - Children
    - 45 CFR 46 Subpart D

Additional Vulnerable Populations

- 45 CFR 46 and 21 CFR 56
  - Persons with physical handicaps
  - Cognitively Impaired or mental disabilities
  - Social and/or economically disadvantaged
- Belmont Report
  - Very Sick
  - Institutionalized
  - Minority groups

Additional Vulnerable Populations

- National Bioethics Advisory Committee
  - Cognitive or communicative vulnerability
  - Institutional vulnerability
  - Deferential vulnerability
  - Medical vulnerability
  - Economic vulnerability
  - Social vulnerability

Do I need a HIPAA Authorization or Waiver of Authorization?

- Are you using PHI
  - Identifiers + Health Information = PHI
  - Includes review of PHI (not just recording PHI)
- Are you from a covered entity?

If you answered “Yes” to these questions, then you need a HIPAA Authorization or Waiver of Authorization

HIPAA Identifiers

1. Name
2. All geographical subdivisions smaller than a state (street address, city, county, precinct). Note: Zip codes or the equivalent must be removed, but the first three digits of the zip code is not considered a "direct identifier" if geographical unit formed by combining all zip codes with the same three digits contain more than 20,000 individuals)
3. All elements of dates except year, for dates directly related to an individual, e.g., date of birth, admission date, discharge date, date of death. For individuals who are 90 years or older, all elements of date, including year, is considered a "direct identifier." Note: if such ages and elements are aggregated into a single category of "age 90 or older" then it is not considered to be a direct identifier.
4. Telephone numbers
5. Facsimile numbers
6. Electronic mail addresses
7. Social Security numbers
8. Medical Records numbers, prescription numbers
9. Health Plan numbers
10. Account Numbers
11. Certificate/license numbers
12. Vehicle identification/serial numbers/license plate numbers
13. Device identifiers/serial numbers
14. Universal Resource Locators (URLs) for Web sites
15. Internet Protocol (IP) Address
16. Biometric Identifiers, e.g. fingerprints, voice prints
17. Full face or comparable photographic images
18. Any other unique number, characteristic, or code that could be used to identify the individual . (If you abstract any unique identifiers, please specify)

HIPAA

- HIPAA Authorizations can be part of the informed consent document or two separate documents
- If requesting a waiver, you must justify your request for a waiver of authorization
  - If you will have contact with participants, justification may be difficult
- You can request an alteration of HIPAA Authorization
  - Recruitment
  - Part of research

Off-site Research

- Need letter of support
  - Outlines that permission has been granted for the research to be conducted at the off-site facility (including recruitment)
- Ensure there are appropriate resources/equipment available to conduct the research as proposed
  - Meeting rooms
  - Exam rooms
  - Computers
- Some locations may require review by their own IRB or equivalent type of committee

International Research (Transnational)

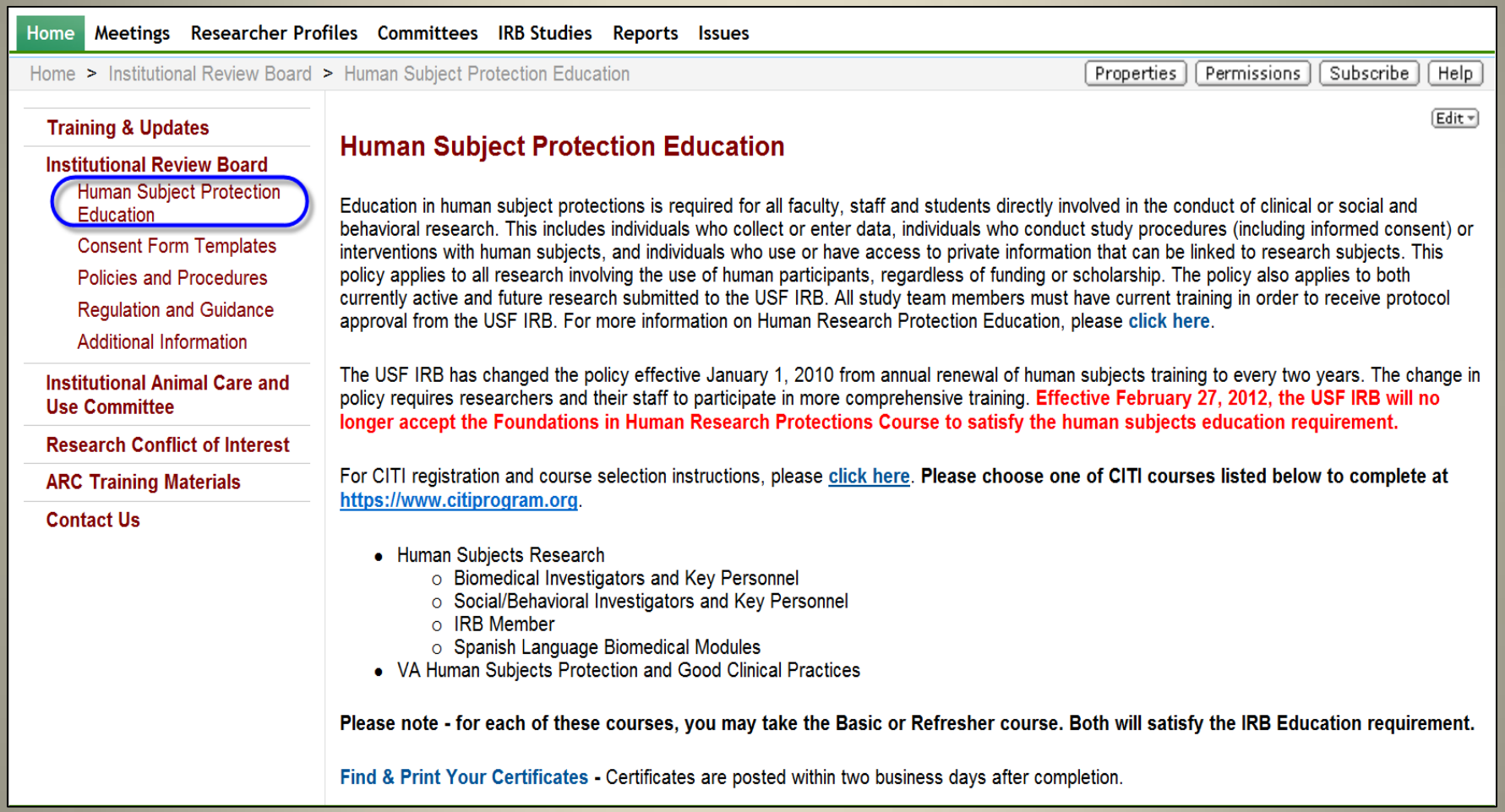
- All Federal Regulations don't always apply
  - Used as guidance
- OHRP Guidance
  - International Compilation of Human Research Standards
- Other guidance
  - Belmont Report
  - Nuremburg Code
  - Declaration of Helsinki
  - International Conference on Harmonization

Full Board determinations What does that mean???

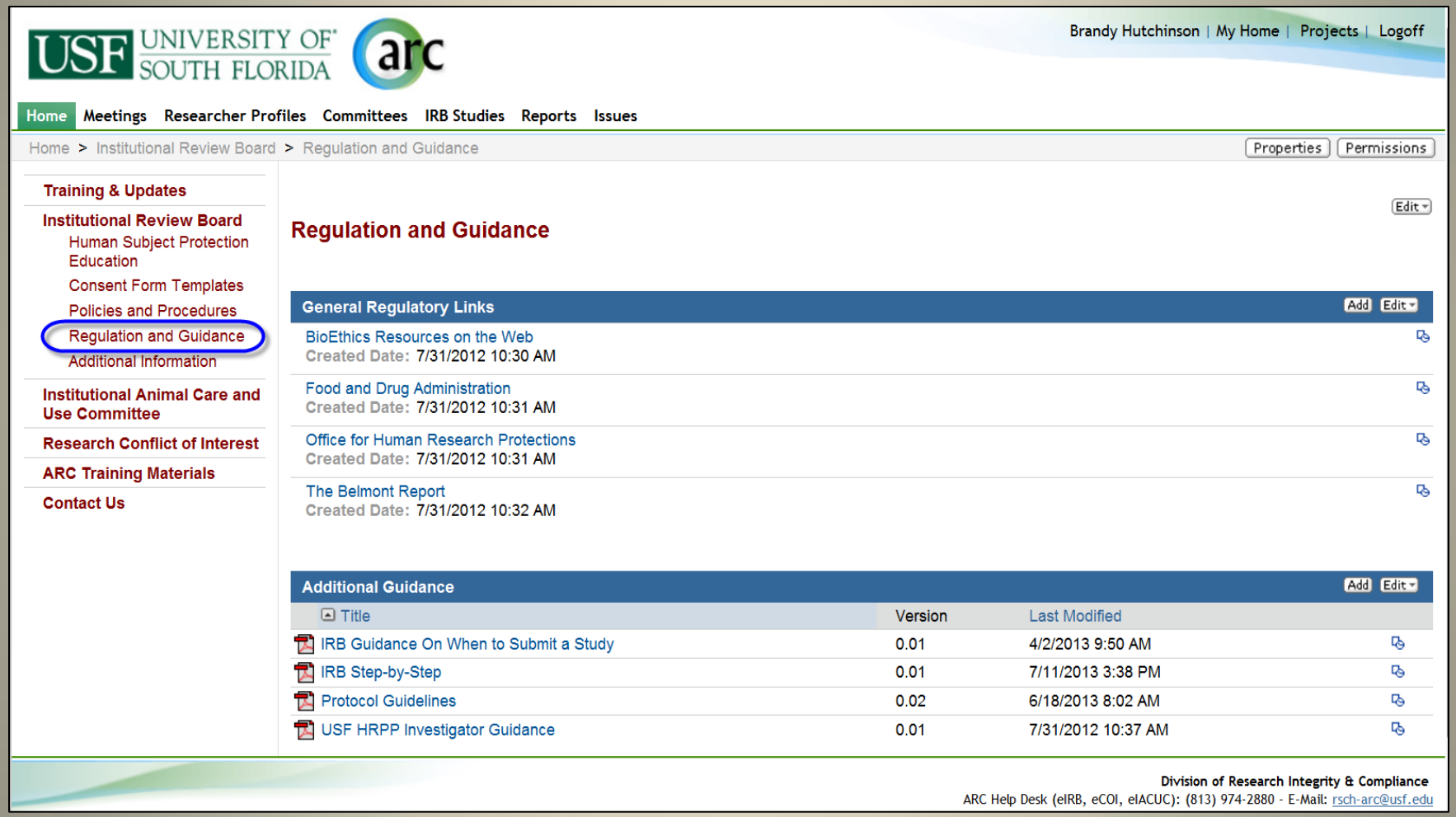
- Approved
  - The IRB approved your study as submitted
- Approved with Contingencies
  - Minor contingencies noted, reviewable by the Chairperson
  - Approved as long as contingencies are met
- Deferred
  - Significant contingencies noted
  - Requires review by the full board again
  - Same Board reviews the submission
  - Potential to be approved
- Disapproved
  - Study is not approvable as submitted
  - Significant changes needed
  - Requires new submission

USF IRB Application
ARC (eIRB)

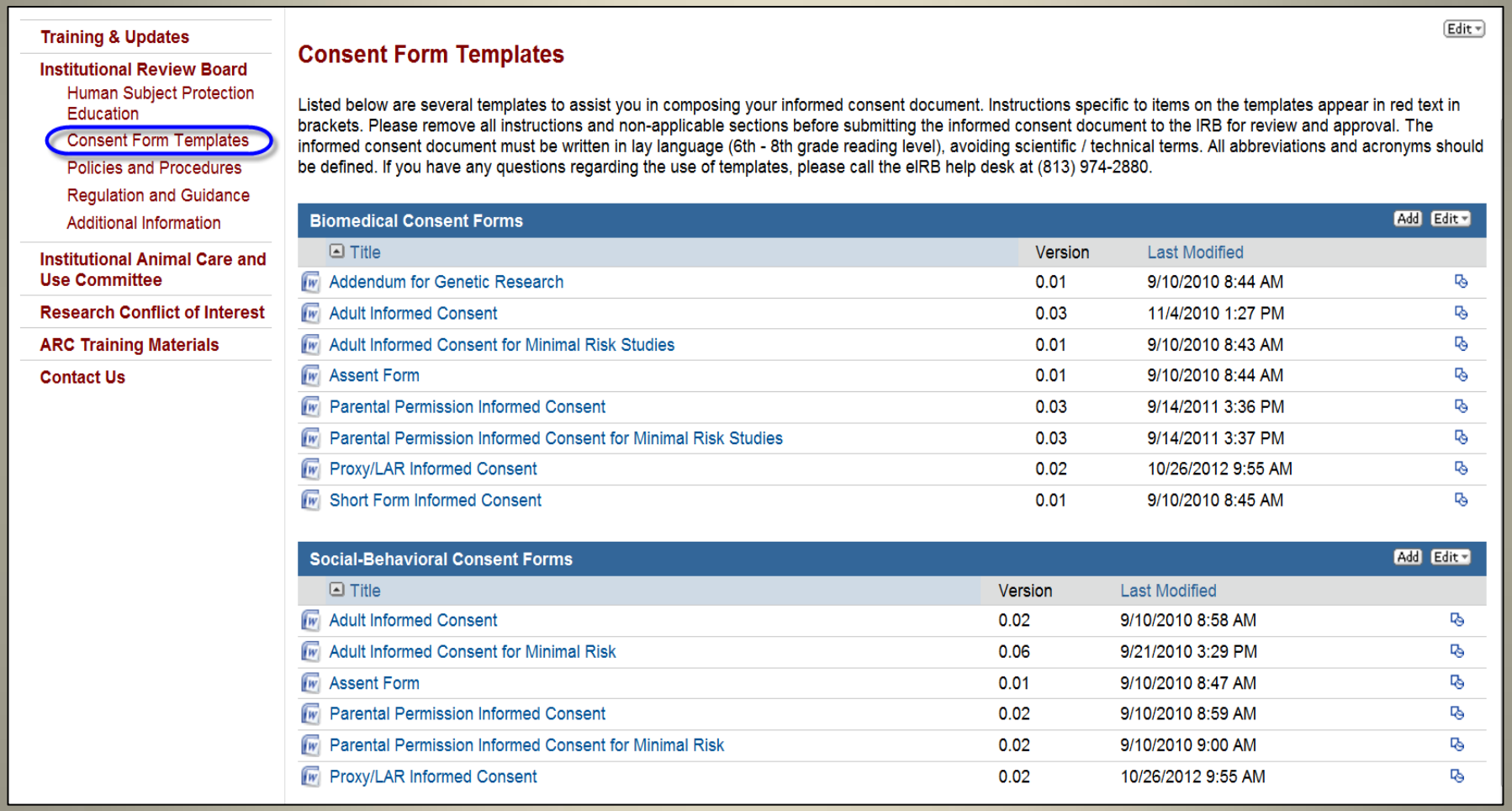
Human Subjects Protection Education



Regulation and Guidance



Consent Form Templates



- Training & Updates
- Institutional Review Board
  - Human Subject Protection Education
  - Consent Form Templates
  - Policies and Procedures
  - Regulation and Guidance
  - Additional Information
- Institutional Animal Care and Use Committee
- Research Conflict of Interest
- ARC Training Materials
- Contact Us

Edit

Consent Form Templates

Listed below are several templates to assist you in composing your informed consent document. Instructions specific to items on the templates appear in red text in brackets. Please remove all instructions and non-applicable sections before submitting the informed consent document to the IRB for review and approval. The informed consent document must be written in lay language (6th - 8th grade reading level), avoiding scientific / technical terms. All abbreviations and acronyms should be defined. If you have any questions regarding the use of templates, please call the eIRB help desk at (813) 974-2880.

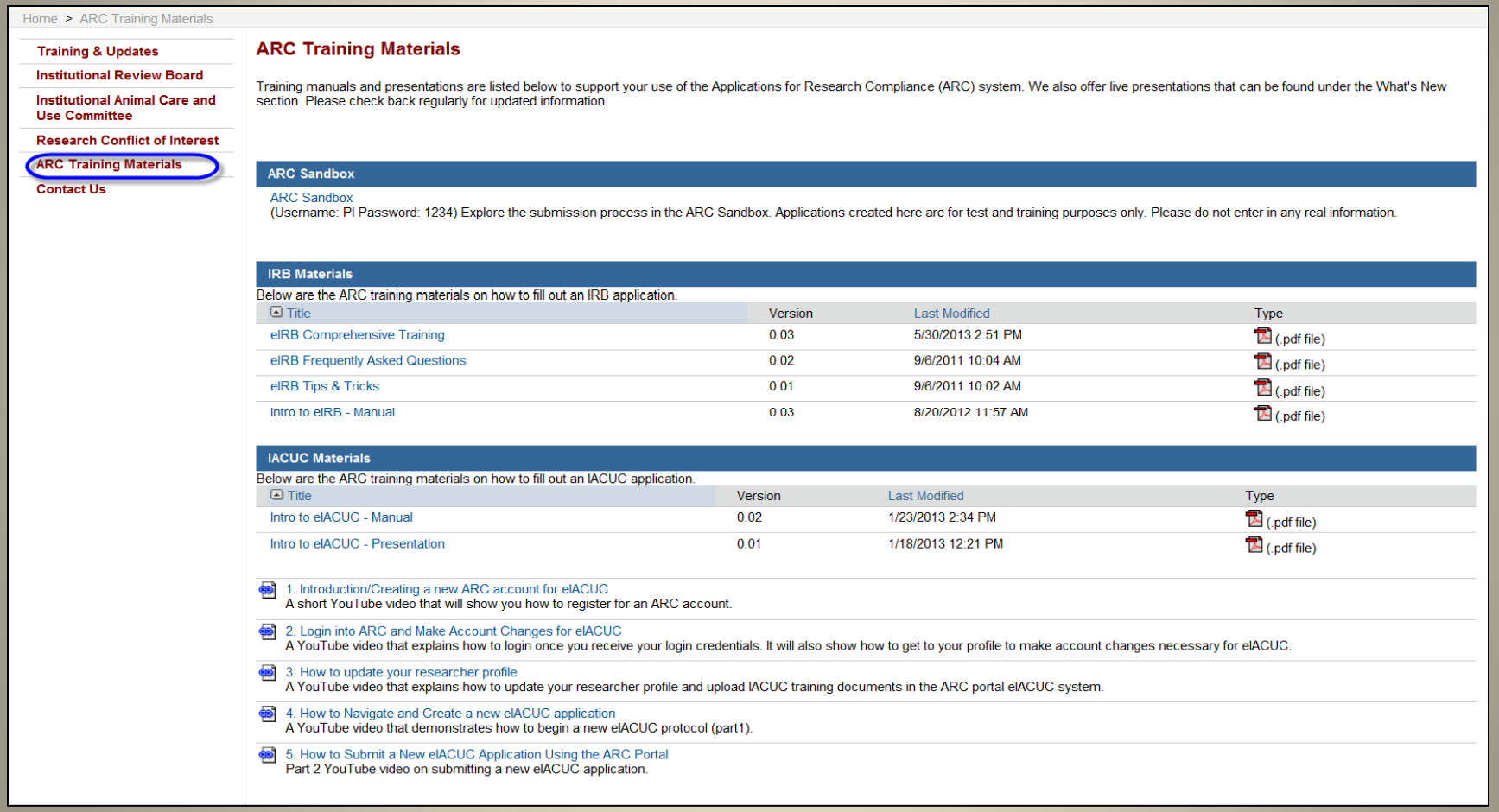
Biomedical Consent Forms — Add Edit

Title	Version	Last Modified
Addendum for Genetic Research	0.01	9/10/2010 8:44 AM
Adult Informed Consent	0.03	11/4/2010 1:27 PM
Adult Informed Consent for Minimal Risk Studies	0.01	9/10/2010 8:43 AM
Assent Form	0.01	9/10/2010 8:44 AM
Parental Permission Informed Consent	0.03	9/14/2011 3:36 PM
Parental Permission Informed Consent for Minimal Risk Studies	0.03	9/14/2011 3:37 PM
Proxy/LAR Informed Consent	0.02	10/26/2012 9:55 AM
Short Form Informed Consent	0.01	9/10/2010 8:45 AM

Social-Behavioral Consent Forms — Add Edit

Title	Version	Last Modified
Adult Informed Consent	0.02	9/10/2010 8:58 AM
Adult Informed Consent for Minimal Risk	0.06	9/21/2010 3:29 PM
Assent Form	0.01	9/10/2010 8:47 AM
Parental Permission Informed Consent	0.02	9/10/2010 8:59 AM
Parental Permission Informed Consent for Minimal Risk	0.02	9/10/2010 9:00 AM
Proxy/LAR Informed Consent	0.02	10/26/2012 9:55 AM

ARC Training Materials



Home > ARC Training Materials

- Training & Updates
- Institutional Review Board
- Institutional Animal Care and Use Committee
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- ARC Training Materials
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ARC Training Materials

Training manuals and presentations are listed below to support your use of the Applications for Research Compliance (ARC) system. We also offer live presentations that can be found under the What's New section. Please check back regularly for updated information.

ARC Sandbox

ARC Sandbox
(Username: PI Password: 1234) Explore the submission process in the ARC Sandbox. Applications created here are for test and training purposes only. Please do not enter in any real information.

IRB Materials

Below are the ARC training materials on how to fill out an IRB application.

Title	Version	Last Modified	Type
eIRB Comprehensive Training	0.03	5/30/2013 2:51 PM	(.pdf file)
eIRB Frequently Asked Questions	0.02	9/6/2011 10:04 AM	(.pdf file)
eIRB Tips & Tricks	0.01	9/6/2011 10:02 AM	(.pdf file)
Intro to eIRB - Manual	0.03	8/20/2012 11:57 AM	(.pdf file)

IACUC Materials

Below are the ARC training materials on how to fill out an IACUC application.

Title	Version	Last Modified	Type
Intro to eIACUC - Manual	0.02	1/23/2013 2:34 PM	(.pdf file)
Intro to eIACUC - Presentation	0.01	1/18/2013 12:21 PM	(.pdf file)

1. Introduction/Creating a new ARC account for eIACUC
A short YouTube video that will show you how to register for an ARC account.

2. Login into ARC and Make Account Changes for eIACUC
A YouTube video that explains how to login once you receive your login credentials. It will also show how to get to your profile to make account changes necessary for eIACUC.

3. How to update your researcher profile
A YouTube video that explains how to update your researcher profile and upload IACUC training documents in the ARC portal eIACUC system.

4. How to Navigate and Create a new eIACUC application
A YouTube video that demonstrates how to begin a new eIACUC protocol (part1).

5. How to Submit a New eIACUC Application Using the ARC Portal
Part 2 YouTube video on submitting a new eIACUC application.

IRB Submission Checklist

- Draft protocol and consent documents
- Complete IRB application and supporting documents
- Notify Team Members to Agree to Participate
- Everyone except PI Agrees to Participate
- All study staff members and PI have current human subjects protections education
- All study staff and PI have a CV/resume uploaded
- PI submits application

Time Savers

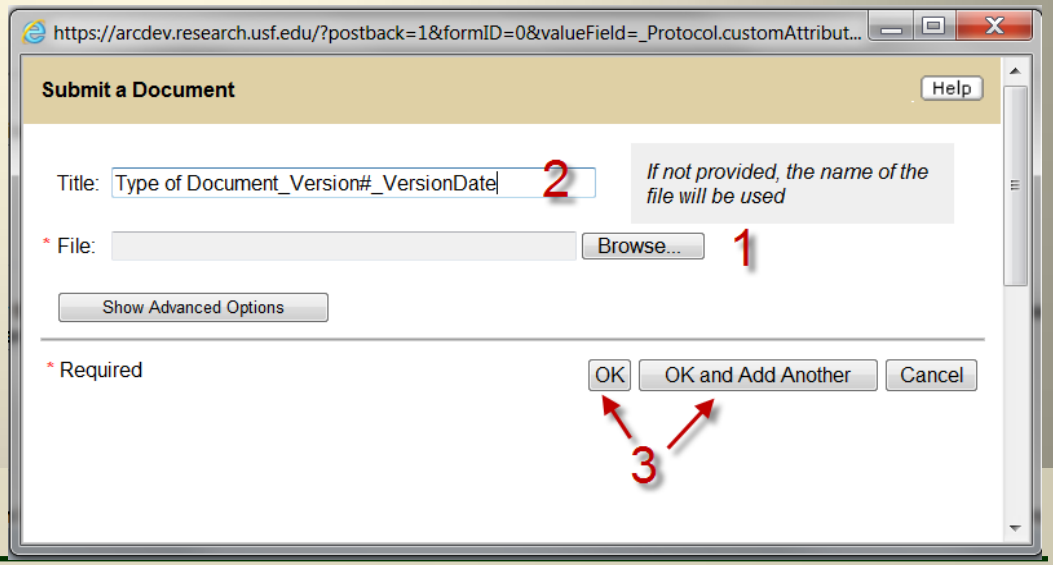
- Amendments
  - When making changes, make sure everything is updated
    - application/consents/protocol/other documents
  - Update versions on documents
  - Provide a tracked AND clean copy of the revised document
- Name documents according to type, along with version numbers and dates
  - Include “protocol” in naming convention of protocol

Time Savers

- Continuing Reviews
- Upload your protocol deviation and adverse event logs into 1.6.9
  - currently only states deviation
- If you don't have any deviations or adverse events, state this in your response to 1.6.8

Time Savers
Naming your documents

1. Click Browse to find your document
2. Name your document
   - Include version # and version date
     - This should also be in the document itself (i.e. footer)
   - Example: *Protocol_v1_7.24.13*
3. Click OK



Recommendations

- Identify a secondary coordinator in your application
  - Can be any Co-investigator or Key Personnel
  - Acts on behalf of primary coordinator or PI
    - Can change and submit
- When revising a document, use “upload revisions”, not “add”

“In the know”

- Approved studies can “designate” another study team member as coordinator
  - Has to already be an approved study staff on IRB application

- IRB Education Certificate activity
  - Now available on ARC users profile page in addition to the study specific workspace
  - Doesn’t have to be under a specific study
  - Once uploaded, it applies to all studies (regardless of how it was uploaded)

What's next…

- IRB Optimization
  - Exempt Application
  - All Applications (expedited/full board)
  - Addition of study staff
- Suggestion Box (ARC)
- Announcements

References

- OHRP Regulations:
  - http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html
  - http://www.hhs.gov/ohrp/international/intlcompilation/intlcompilation.html
- FDA Website:
  - www.fda.gov
- USF Policies:
  - http://www3.research.usf.edu/dric/hrpp/policy-procedure.asp
- ARC Site:
  - https://arc.research.usf.edu/Prod

Contacts

- ARC Help Desk:
  - (813) 974-2880 - E-Mail: rsch-arc@usf.edu
- Main reception:
  - (813) 974-5638
- Brandy Hutchinson, IRB Manager:
  - (813) 974-8553 / bhutchin@usf.edu

Questions