LEAD PRINCIPAL INVESTIGATOR RESPONSIBILITIES
sIRB GUIDANCE AND CHECKLIST*

Effective January 25, 2018, the National Institutes of Health (NIH) will initiate a policy on the Use of a Single Institutional Review Board of Record for Multi-Site Research. This policy applies to the domestic sites of NIH-funded multi-site studies where each site will conduct the same[1] protocol involving non-exempt human subjects research, whether supported through grants, cooperative agreements, contracts, or the NIH Intramural Research Program. The expectation[2] is that all sites participating in multi-site studies involving non-exempt human subjects research funded by the National Institutes of Health (NIH) will use a single Institutional Review Board (sIRB) to conduct the ethical review required by the Department of Health and Human Services (HHS) regulations for the Protection of Human Subjects at 45 CFR Part 46.

A single IRB must be selected prior to proposal preparation, a plan must be developed and included in the proposal (ie, SF-424 "Application for Federal Assistance") when submitted to NIH. Failure to include this information or other required information related to Clinical Trials in submitted proposals, may render the proposal non-responsive. This document provides sIRB guidance from proposal preparation to initiation of the research for a Lead Principal Investigator seeking NIH-support through a grant, cooperative agreement, or contract for a multi-site study involving human participants[3].

I. Proposal Stage *(At least 6-8 weeks before proposal deadline)*

- **Contact Valerie Sanchez, IRB Reliance Administrator: 949-824-7735 / IRBReliance@uci.edu:**
  - Discuss whether UCI IRB can act as the single IRB (sIRB) or whether an external IRB would be appropriate. In general, UCI can serve as the sIRB for a multi-site protocol involving no more than four sites, including UCI. Provide study details, including draft of Master Protocol and template consent form.
  - Identify all sites that will be engaged in human subjects research.
  - Identify who will act as the Coordinating unit (e.g., your study team, a coordinating center, or both). This unit will coordinate with the sites and the sIRB. The coordinating unit and the Lead PI assumes additional responsibilities when sIRB review is used.
  - Determine whether existing IRB agreement(s) (such as SMART IRB, UC Reliance) could be used for all sites or if additional agreement(s) are necessary.
- **If UCI agrees to serve as the sIRB for the study, the Lead Researcher will:**
  - Submits relevant documentation to request sIRB using the IRB submission process required UCI IRB.

[1] Protocols that address the same research questions with the same purpose, involve the same methodologies and procedures, and evaluate the same outcomes are considered to be the "same research protocol." Additionally, sites that are accruing research participants for studies that are identical except for variations due to local context consideration would be considered to be conducting the "same research protocol." If a study involves a separate site for study coordination or coordination of data and statistical analyses and the site is conducting the same protocol as the other participating sites, then all sites would be expected to rely on the designated single IRB. Investigators who have questions about whether specific research protocols fall under the policy should discuss them with the Program Official listed on the FOA.

[2] Exceptions to the sIRB policy will be granted if the use of a sIRB is prohibited by federal, state, or tribal laws or regulations. Also granting an exception will be considered if a request is made and a compelling justification is provided for why an exception is needed.

[3] Excludes career development, research training or fellowship awards

* Modified version of SMART IRB Overall Principal Investigator/Lead Study Team Guidance and Checklist

- Ensure the Coordinating unit works in collaboration with the UCI IRB to determine and document specific roles and responsibilities for communicating and coordinating key information among all participating sites, including Relying Institutions; this includes developing a plan for communicating with collaborators across the lifetime of the study (i.e. regular conference calls, site initiation procedures and training materials).

If necessary to find another sIRB, the Lead Researcher will:

- Check with other participating sites to see if their IRB could serve as the sIRB. Consider working with independent IRBs (e.g., Western IRB, Quorum, Advarra (aka Shulman and Chesapeake)).
- Work with the sIRB to determine sIRB Budget. sIRB Budget is based on the specifics of the research study including the number of sites, the anticipated duration of the study, and the anticipated number of modifications/amendments. *Note: Some sIRBs will also charge fees to negotiate IRB agreements not already in place.*
- Works in collaboration with the sIRB to determine and document specific roles and responsibilities for communicating and coordinating key information among all participating sites, including Relying Institutions; this includes developing a plan for communicating with collaborators across the lifetime of the study (i.e. regular conference calls, site initiation procedures and training materials).

The Lead Researcher must include in the proposal to SPA for submission to NIH:

- A sIRB plan describing the use of the sIRB that will be selected. The plan should include the following elements:
  - Describe how you will comply with the NIH Policy on the Use of sIRB for Multi-Site Research.
  - Description of how communications between all participating sites and sIRB will be handled.
  - Provide the name of the IRB that will serve as the sIRB of record.
  - Indicate that all identified participating sites have agreed to rely on the proposed sIRB and that any sites added after award will rely on the sIRB.
  - Indicate that all participating sites will, prior to initiating the study, sign an authorization/reliance agreement that will clarify the roles and responsibilities of the sIRB and participating sites.
  - Indicate which institution or entity will maintain records of the authorization/reliance agreements and of the communication plan.
  - *Note: If direct costs are anticipated to be over $500,000 Applicant/Offeror is required to contact the IC Program staff six weeks prior to submission.*
  - *Note: Do not include the authorization/reliance agreement(s) or the communication plan(s) documents in your application.*
- A "sIRB Budget" that includes direct cost funding for the costs associated with the establishment and review of the multi-site study by the sIRB. These costs should be included in section F, line 8-10 of the NIH Budget form and fully justified in the accompanying budget justification. *Note: Costs must be consistent with cost principles, as described in the NIH Grants Policy Statement and the Uniform Guidance at 2 CFR part 200.*

II. Pre-Award Stage

After submitting the proposal to NIH but before the award has been issued or at the Just in time Phase if the sponsor indicates there's a great likelihood of the proposal being funded, the **Lead Researcher should:**

- Work with the Reviewing IRB, as requested, to submit the IRB Protocol and to execute any required IRB Authorization Agreements.
- Coordinate gathering key information such as local context from all sites.
- Promptly respond to questions or requests for information from Reviewing IRB.
- Provide the Site Investigators with the IRB policies of the Reviewing IRB. This includes, but is not limited to, policies for reporting unanticipated problems, noncompliance, and subject complaints.
- Ensure that Site Investigators understand and fulfill any documentation requirements of their local HRPPs (e.g., tracking, ancillary reviews, and local consent boilerplate).
- Notify Coordinating Unit of approval upon receipt of such notification from the Reviewing IRB

III. Post-Award Stage

Once the award has been "issued" to the Lead Site, the Lead Researcher shall notify the Coordinating Unit of receipt of the award as well as IRB approval of the Protocol. The **Coordinating Unit** should:

- Provide Relying Sites with the IRB-approved versions of all study documents (e.g., consent and authorization forms, protocol, recruitment materials).
- Prepares and submits on behalf of all sites, local modifications, personnel updates, local reportable events, and study wide amendments and information for continuing review.
    - As part of preparing the protocol amendments or continuing review applications, the Coordinating Unit (e.g., Lead Study Team) must:
        - Have a mechanism in place to obtain and collate information from Relying Site Study Teams and/or Relying Site Administrative Contacts (ACs), depending on who is designated to provide that information at the Relying Institution, regarding local variations in study conduct, such as recruitment materials and process, consent process and language, and subject identification processes.
        - Assist Relying Site Study Teams and/or ACs at the Relying Institution(s), depending on who is designated to provide that information, in ensuring consent documents follow the Reviewing IRB's template form and include applicable site-specific required language from each Relying Institution.