IRB Reliance Platforms:

SMART IRB Reliance System and IREx

Veronica Jimenez, MPH, CIP
IRB Reliance Administrator
HUMAN SUBJECTS PROTECTION PROGRAM

Objectives

- Briefly describe the SMART IRB Agreement.
- Review when single IRB review is required and how the reviewing IRB is determined.
- Provide a simplistic overview of the workflow for requesting reliance on a single IRB.
- Review the SMART IRB Communication Plan.
- Provide a general overview of the online reliance platforms:
  - IRB Reliance Exchange (IREx)
  - SMART IRB Reliance System

Glossary of Terms

Single Institutional Review Board (sIRB): Refers to the use of one IRB to oversee all sites participating in a multisite study or clinical trial

- In the SMART IRB Reliance system, it is referred to as the ***Reviewing IRB***.

Multisite: Under the NIH Single IRB Review policy, "multisite" is defined as two or more sites.

Ceded Study: A research study that is deferred to an external IRB for review and oversight.

Reviewing IRB: The IRB serving as the IRB of record for all participating sites in a multisite research study.

Relying IRB: The IRB that is relying on the review of another IRB that is serving as the Reviewing IRB on a multisite research study.

Participating Institution: An institution (including an IRB organization) that meets the eligibility requirements set forth in the SMART IRB Agreement and agrees to accept the terms and conditions of the Agreement.

What is the SMART IRB Agreement?

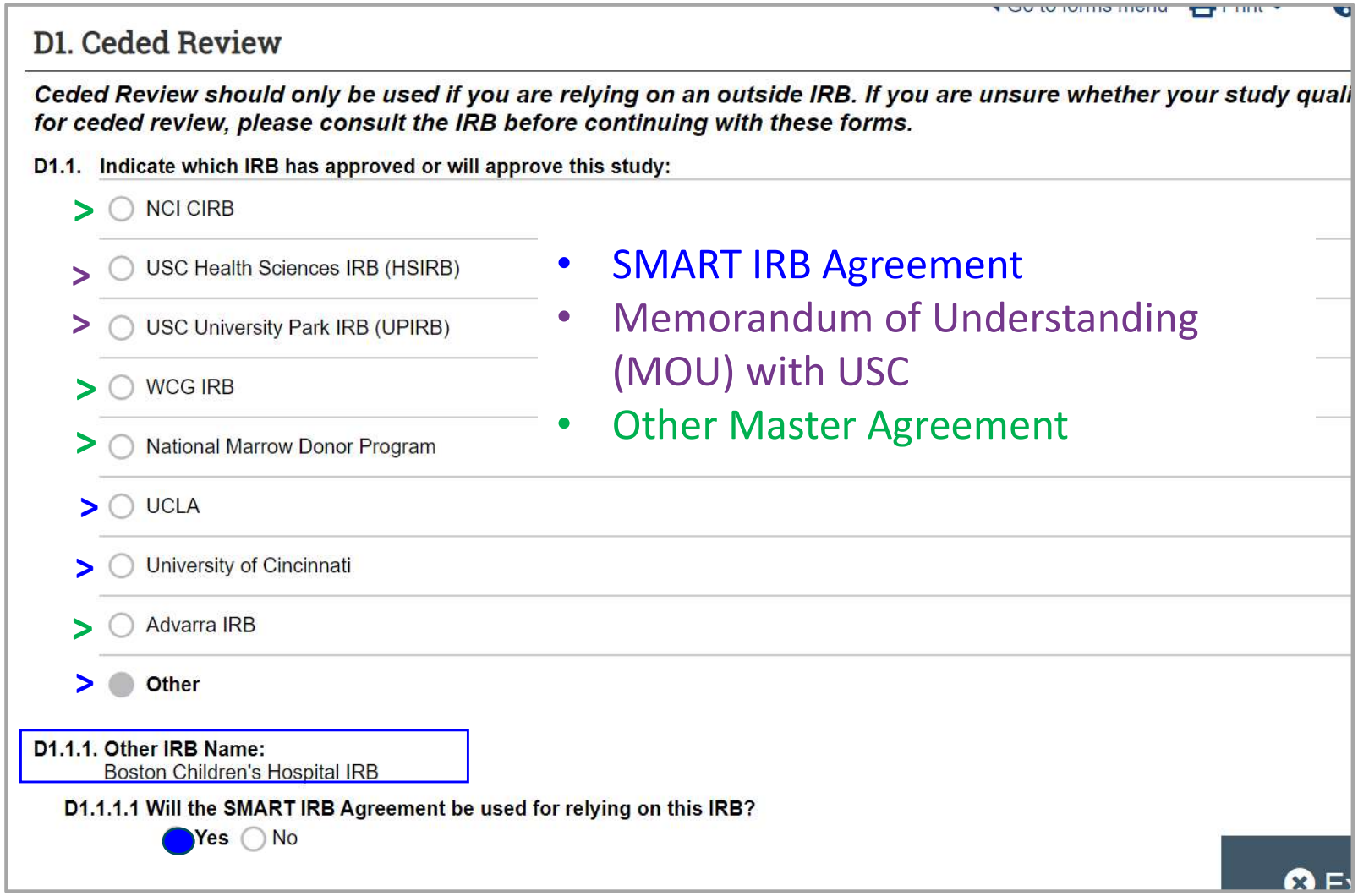
SMART IRB Agreement:

The “SMART IRB” is not an IRB, but a master reliance agreement that was created in 2016 to harmonize and streamline the IRB review process for multisite studies. It enables reliance on a study-by-study basis, defines the roles and responsibilities of relying institutions and reviewing IRBs, and eliminates the need to sign reliance agreements for each study (e.g., a non-SMART IRB agreement).

- Over 1,000 institutions, including CHLA, have already signed onto this agreement and are actively using it as the basis of reliance for multisite projects. For a listing of participating institutions see **smartirb.org/participating-institutions/ - Opens in a new window**.

Indicating Use of the SMART IRB Agreement in iStar

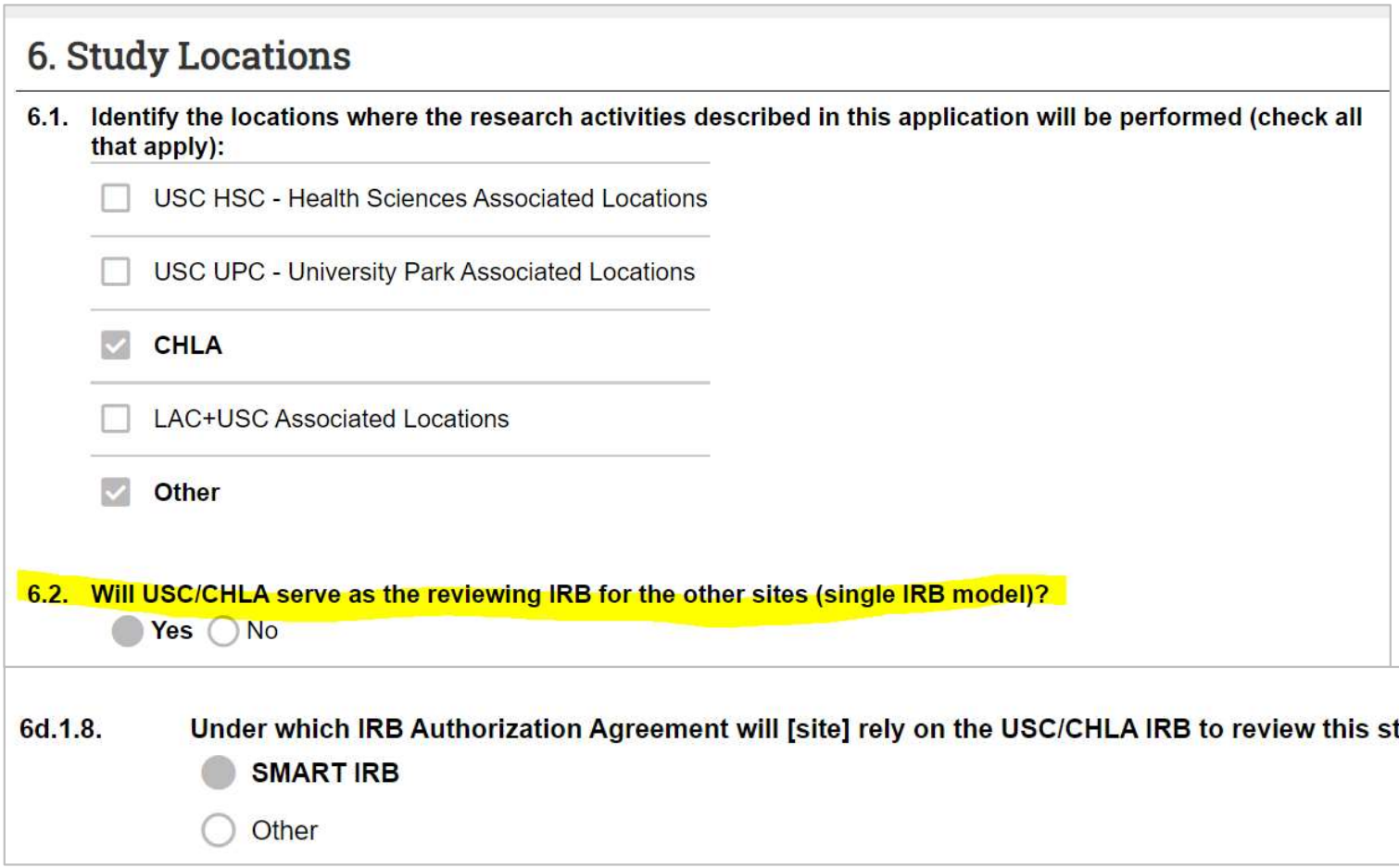
For a ceded applications:



- SMART IRB Agreement
- Memorandum of Understanding (MOU) with USC
- Other Master Agreement

Indicating use of the SMART IRB Agreement in iStar (cont'd)

When CHLA is the Reviewing IRB:



6. Study Locations

6.1. Identify the locations where the research activities described in this application will be performed (check all that apply):

- ☐ USC HSC - Health Sciences Associated Locations
- ☐ USC UPC - University Park Associated Locations
- ☑ **CHLA**
- ☐ LAC+USC Associated Locations
- ☑ **Other**

6.2. Will USC/CHLA serve as the reviewing IRB for the other sites (single IRB model)?

● Yes ○ No

6d.1.8. Under which IRB Authorization Agreement will [site] rely on the USC/CHLA IRB to review this study?

● SMART IRB

○ Other

When is sIRB Review Required?

Single IRB review is necessary **to comply with NIH grants policy** and **federal regulations** requiring the use of a single IRB for review of non-exempt multisite research and clinical trials.

How is the Reviewing IRB Determined?

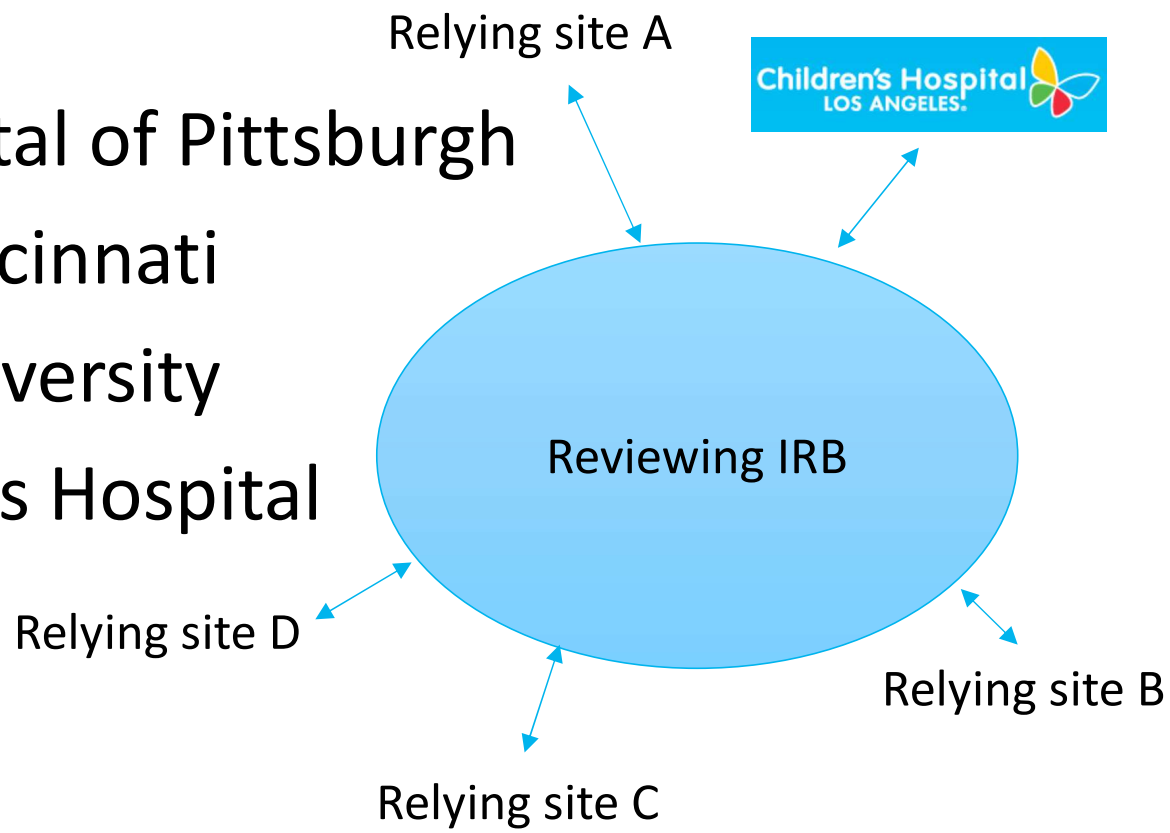
- Typically, the primary awardee of the grant will serve as the Reviewing IRB.
- For industry sponsored multi-center clinical trials, all studies are reviewed to by a central IRB:
  - Commercial IRBs: WCG IRB, Advarra IRB, or Sterling IRB

Any time a non-exempt, federally funded/supported, multi-site study is **NOT** reviewed by CHLA IRB, we refer to it as a **ceded study**. CHLA is considered a **Relying Site**.

Examples of External IRBs

External IRBs

- City of Hope IRB
- Children's Hospital of Pittsburgh
- University of Cincinnati
- Florida State University
- Boston Children's Hospital



Reliance Request Workflow

Lead PI will discuss the study with their institution

The **lead institution** determines if the study is eligible for single IRB review and, if so, either confirms the proposed Reviewing IRB or proposes a new Reviewing IRB.

Lead institution may communicate with **Relying Sites** through:
- IREx
- SMART IRB Reliance System
- email

Lead PI will submit to the **Reviewing IRB** for approval

Communication Plan

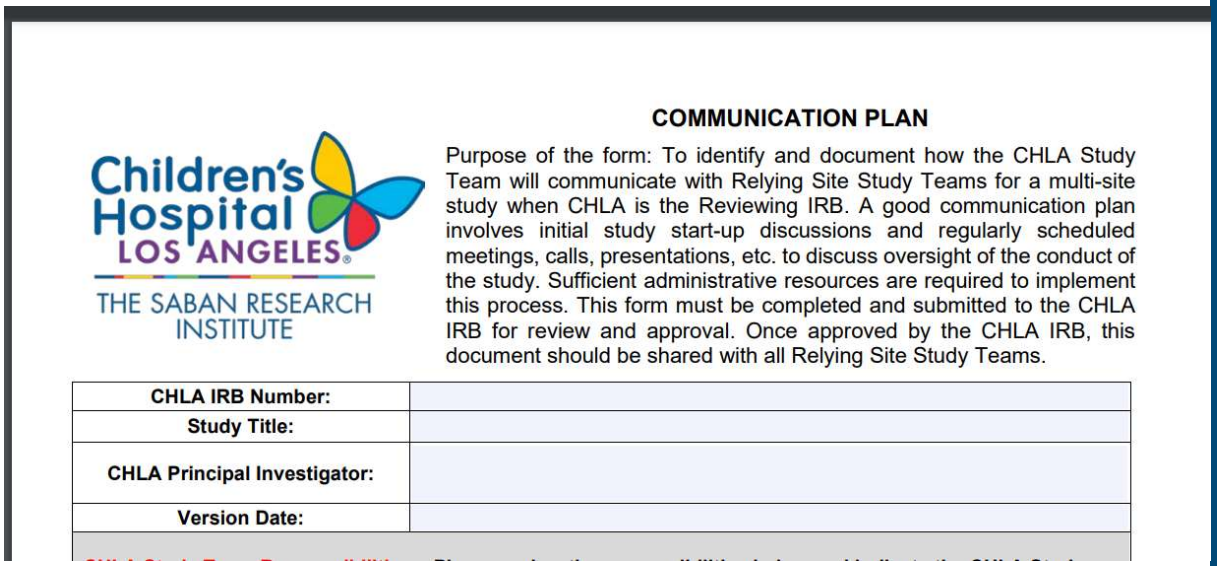
The SMART IRB communication plan template can be used to outline key communication responsibilities, such as who is responsible for:

- preparing and submitting the initial application, continuing reviews, amendments and reportable events for each site to the Reviewing IRB.
- providing conflict of interest management plans to the Reviewing IRB.
- providing IRB-approved documents and communicating Reviewing IRB determinations to relying site study teams.

- The **Reviewing IRB** may ask the **Lead PI** develop a communication plan.
- **Relying Sites** may ask the **Reviewing IRB** for the communication plan.

CHLA Communication Plan

When **CHLA is the Reviewing IRB**, PIs are asked to develop a plan for communicating with Relying Site Study Teams.



COMMUNICATION PLAN

Children's Hospital LOS ANGELES
THE SABAN RESEARCH INSTITUTE

Purpose of the form: To identify and document how the CHLA Study Team will communicate with Relying Site Study Teams for a multi-site study when CHLA is the Reviewing IRB. A good communication plan involves initial study start-up discussions and regularly scheduled meetings, calls, presentations, etc. to discuss oversight of the conduct of the study. Sufficient administrative resources are required to implement this process. This form must be completed and submitted to the CHLA IRB for review and approval. Once approved by the CHLA IRB, this document should be shared with all Relying Site Study Teams.

CHLA IRB Number:	
Study Title:	
CHLA Principal Investigator:	
Version Date:	

They are asked to complete the **CHLA Communication Plan** document and submit it for CHLA IRB review and approval. Once approved, the Communication Plan should be shared with all Relying Site Study Teams.

Reliance Platforms

Communication with Relying Sites may occur through:

SMART IRB Reliance System

https://reliance.smartirb.org/users/sign_in

IREx IRB Reliance Exchange
YOUR SYSTEM SOLUTION FOR SINGLE IRB REVIEW

https://www.irbexchange.org/s/login

Attachments (i.e., Word documents) sent to study team.

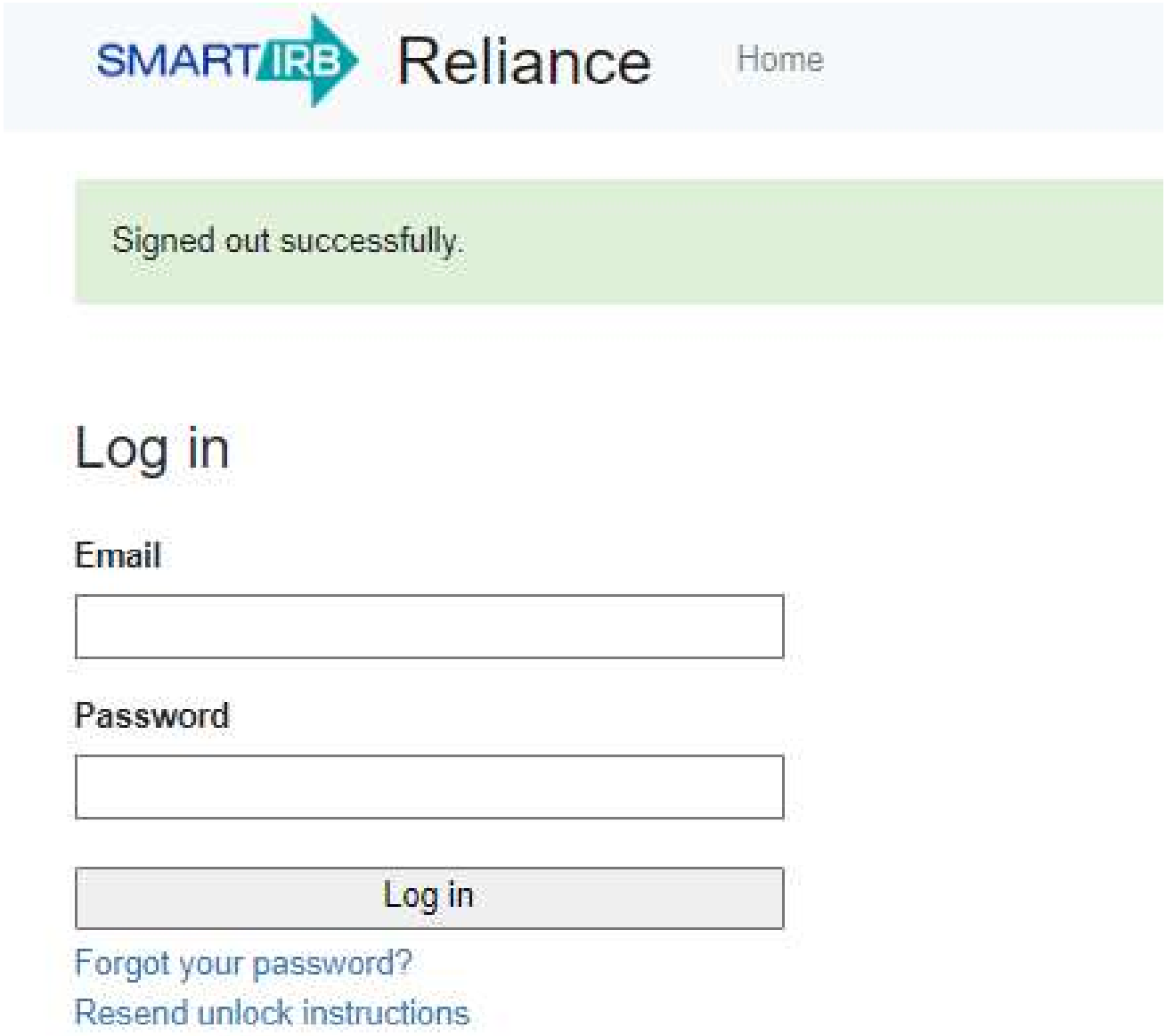
Which Platform Should I Use?

When CHLA is the Reviewing IRB:

- The study team may choose to use either the SMART IRB Reliance System or IREx
- IREx is the preferred platform

When CHLA is the Relying site:

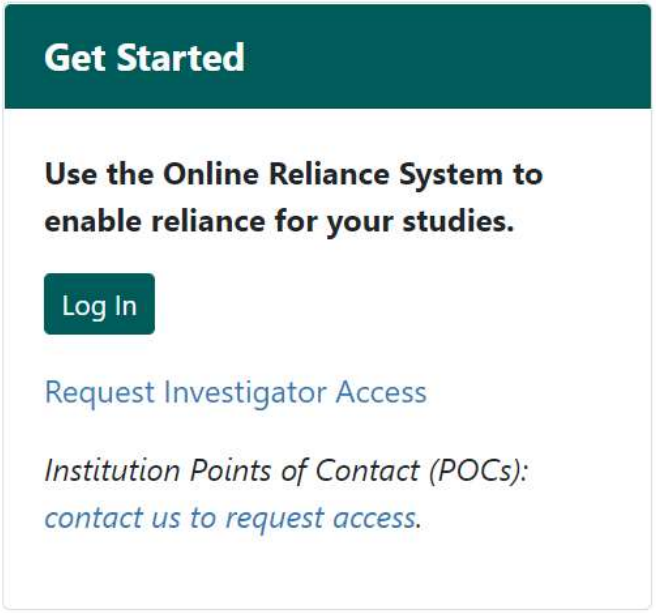
- The **Reviewing IRB** will choose the platform.
- They may choose to email the study team reliance documents (e.g., Site Information Sheet). Study teams forward those documents to IRBReliance@chla.usc.edu for signature.


SMART IRB
Reliance
Home
Signed out successfully.
Log in
Email
Password
Log in
Forgot your password?
Resend unlock instructions

User Accounts For SMART IRB Reliance

Who needs an account for SMART IRB Reliance System?

- PI
- PI's designee
- Institutional point of contact (POC)
- Institutional POC back up



Communication Workflow

Lead PI or designee

Relying Institution POC

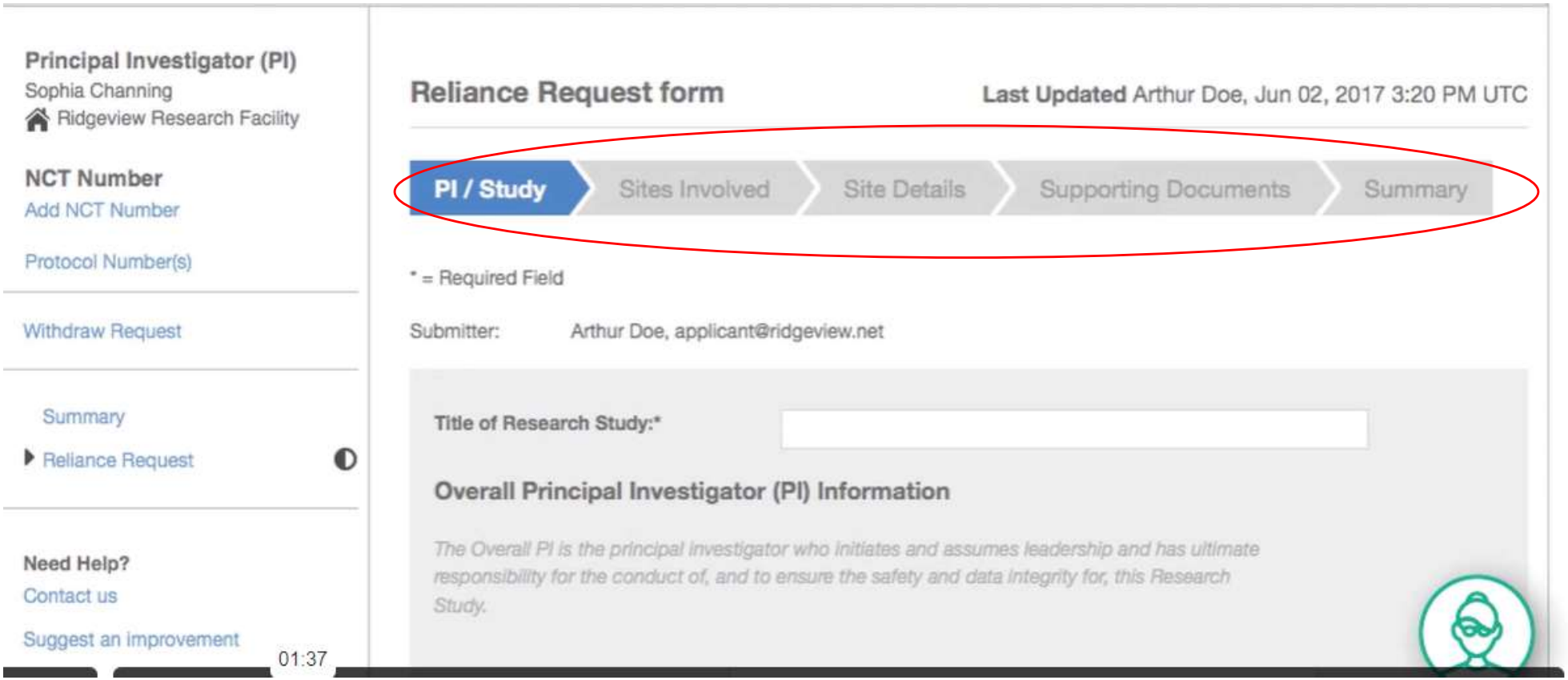
(Proposed) Reviewing IRB POC

Relying Sites

Requesting Reliance using SMART IRB Reliance

- Request for Reliance begins with **lead PI or designee.**
- The **lead PI or designees** will log into the SMART IRB Reliance System to:
  - Provide details about the study
  - List engaged sites
  - Identifies activities and personnel at each site
  - Upload research protocol and consent templates
  - Propose Reviewing IRB – drop down shows list of institutions that have signed on to the SMART IRB Agreement.

Reliance Request Form



Recording and Communicating Willingness to Rely

The **Relying Institution POC:**

- is notified when a ***Proposed Reviewing IRB*** has been identified by the Lead Institution.
- records its decision regarding reliance request (willingness to rely on the Reviewing IRB).
- makes the ***Proposed Reviewing IRB*** aware of institutional requirements and local context concerns (aka local considerations).

Reviewing IRB is Confirmed

When all institutions have submitted reliance forms, requests goes back to **Proposed Reviewing IRB POC**.

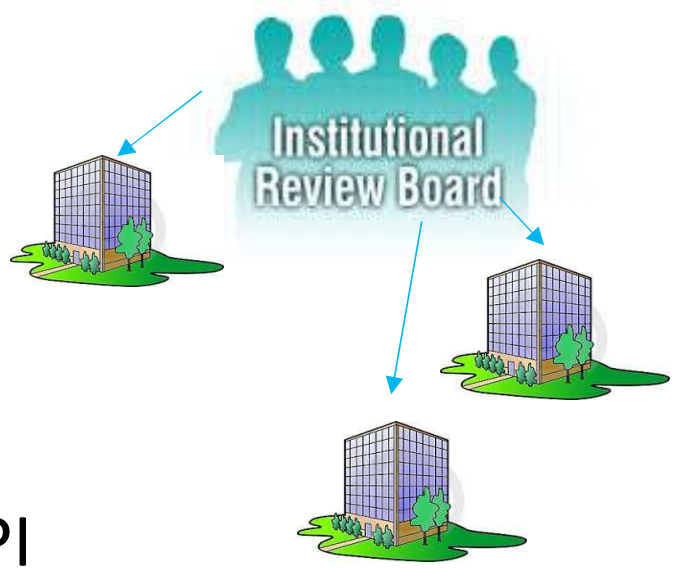
The Proposed Reviewing IRB POC:

- reviews forms and finalizes reliance decision
- will indicate its willingness to serve as the Reviewing IRB for each site that indicated willingness to rely.

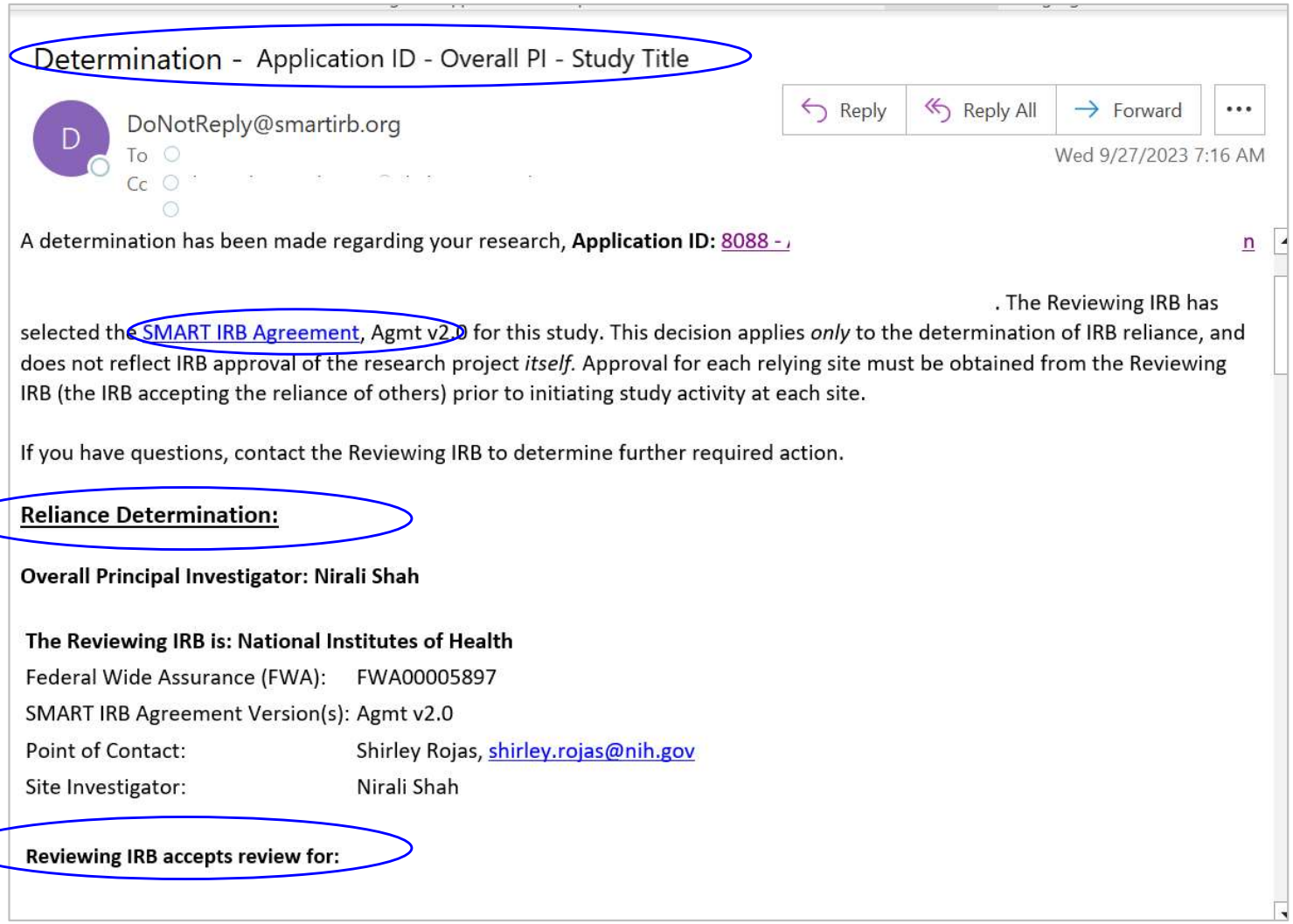
Reviewing IRB Determination

Reviewing IRB POC will issue a determination letter to all relying sites (PI and PI's designee) that will:

- Document the reliance arrangement
- Identify relying sites
- Identify sites that will not rely on the reviewing IRB
- Outlines responsibilities of the lead PI and site PI



Determination Notification



Determination - Application ID - Overall PI - Study Title

D DoNotReply@smartirb.org

To

Cc

Reply | Reply All | Forward | ...

Wed 9/27/2023 7:16 AM

A determination has been made regarding your research, **Application ID:** 8088 - , n

. The Reviewing IRB has selected the SMART IRB Agreement, Agmt v2.0 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: Nirali Shah

The Reviewing IRB is: National Institutes of Health

Federal Wide Assurance (FWA): FWA00005897

SMART IRB Agreement Version(s): Agmt v2.0

Point of Contact: Shirley Rojas, shirley.rojas@nih.gov

Site Investigator: Nirali Shah

Reviewing IRB accepts review for:

IRB Reliance Exchange

YOUR SYSTEM SOLUTION FOR SINGLE IRB REVIEW

User accounts for IRB Reliance Exchange

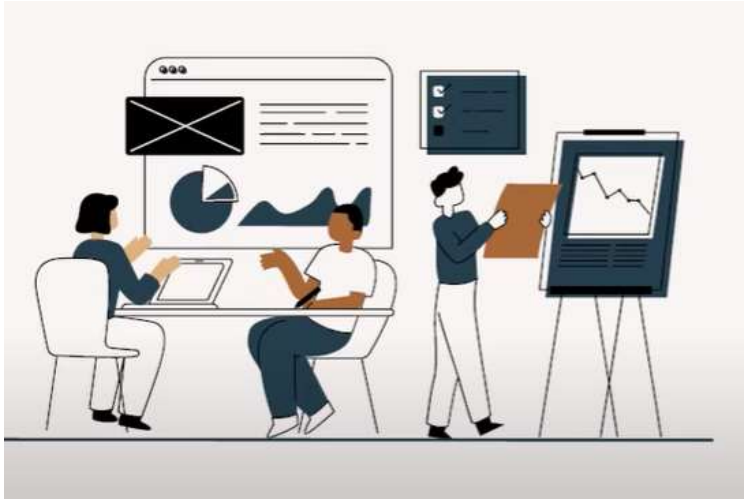
YOUR SYSTEM SOLUTION FOR SINGLE IRB REVIEW

Who will have access to IREx?

IREx Liaison - IRB staff who conduct the day-to-day single IRB operations. This person will grant the PI, Study Manger, and Study Team Members access to IREx.

- **PI**
- **Study Manager** - someone from the Lead Study Team or Coordinating Center who is responsible for managing participating site access to IREx and overseeing participating site readiness for single IRB (sIRB) review.
- **Study Team Member** - This role is intended for anyone on the study team other than an investigator.

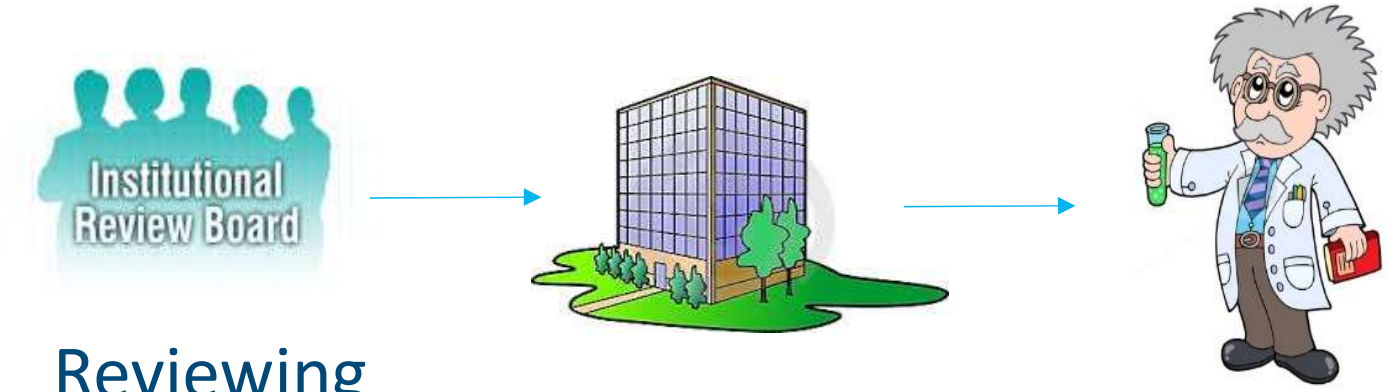
Study Manager



The Study Manager will:

- Add relying sites to IREx
- Download sites' local considerations for submission to the sIRB
- Alert sites of their access to the study in IREx
- Upload initial sIRB approval for participating sites
- Upload site approvals

Communication in IREX



Reviewing IRB

Relying Site POC

Site PI

Requesting Reliance using IRB Reliance Exchange

YOUR SYSTEM SOLUTION FOR SINGLE IRB REVIEW

Request for Reliance begins with the **Reviewing IRB/HRPP.**

- The **Reviewing IRB** will create the study in IREx.
  - Studies are typically created in IREx after the **Reviewing IRB** receives the submission from the lead site.
- **Relying Site POC** will be notified when to log in to IREx to:
  - Register the Relying Site PI in the study
  - ***Indicate reliance*** by accepting the sIRB's Study-specific Reliance Plan (SSRP).

Provide local consideration

Relying Site POC will:

- **Complete HRP Survey:** The HRP Survey asks about requirements of any applicable state or local laws, regulations, institutional policies, standards, or other local factors, including local site ancillary reviews, ***relevant to the specific study or trial*** that would affect the research at the institution.

Identify Reliance Agreement and Confirm IP

Relying Site POC will:

- Indicate the use of the SMART IRB Agreement
- Confirm the Institutional Profile (IP): The IP captures ***general information*** about the institution, over-arching state laws or institutional policies affecting research, and the reliance process at the site.

Local PI Survey

The PI Survey asks about the conduct of the study at the site.

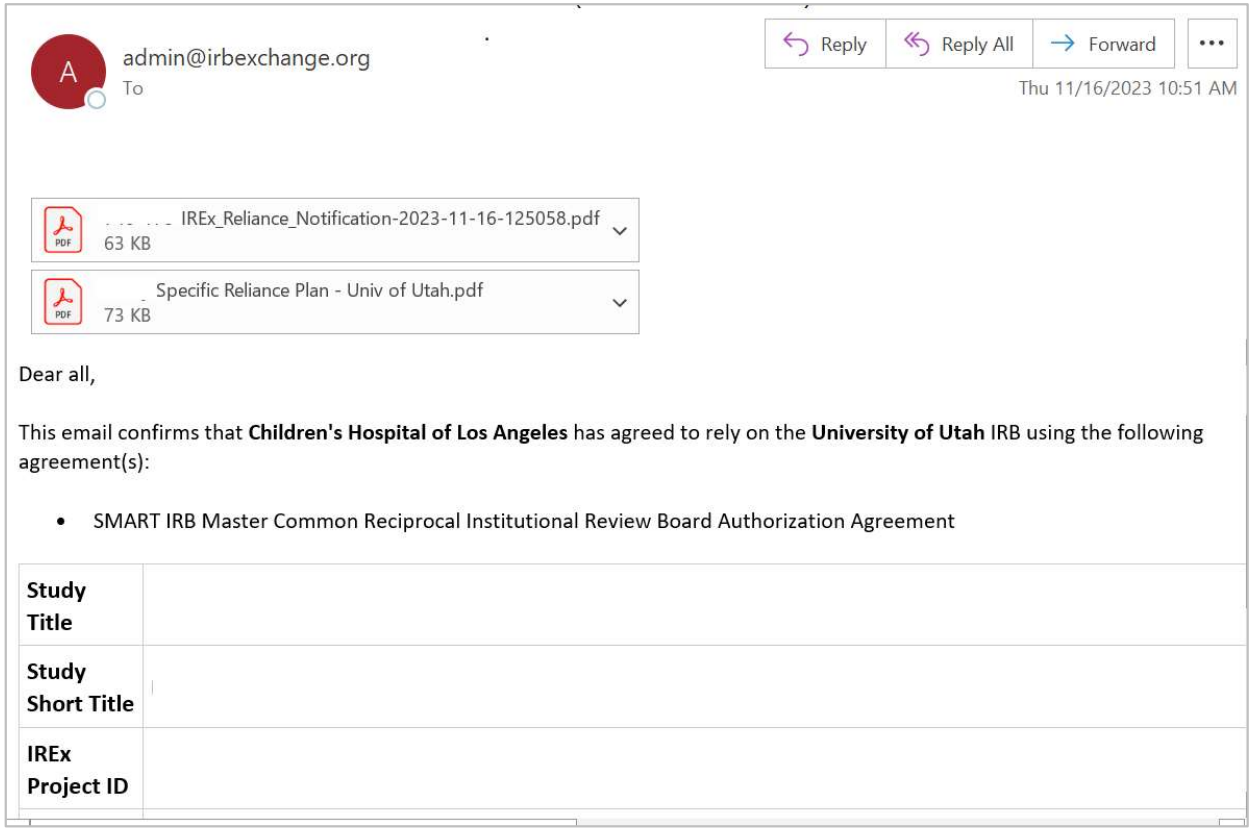
- The PI will receive an email notification when they are able to complete the PI Survey.
- The Study Team Member may complete PI Surveys in IREx on the investigator's behalf. The PI's attestation will be required.
- Any edits made to the PI Survey by the Investigator, Study Team Member, or Relying HRPP after the initial attestation will require a new attestation.

Local PI Survey (cont'd)

Local PI Survey

Study Title	
Participating Site Name:	Children's Hospital of Los Angeles
STUDY TEAM INFORMATION	
Site Investigator's Name	
Site Investigator's Email Address	
Site Investigator's Phone	
Lead Study Contact Name	
Lead Study Contact Email	
Lead Study Contact Phone	
Please review the planned list of personnel who will be engaged in human subjects research. Has all required training for the conduct of the research at your site been completed for each individual, including human subjects protections training, GCP training, and HIPAA training, as applicable?	

IREx: Notification of Reliance



admin@irbexchange.org
To

Reply | Reply All | Forward | ...

Thu 11/16/2023 10:51 AM

IREx_Reliance_Notification-2023-11-16-125058.pdf
63 KB

Specific Reliance Plan - Univ of Utah.pdf
73 KB

Dear all,

This email confirms that **Children's Hospital of Los Angeles** has agreed to rely on the **University of Utah** IRB using the following agreement(s):

- SMART IRB Master Common Reciprocal Institutional Review Board Authorization Agreement

Study Title	
Study Short Title	
IREx Project ID	

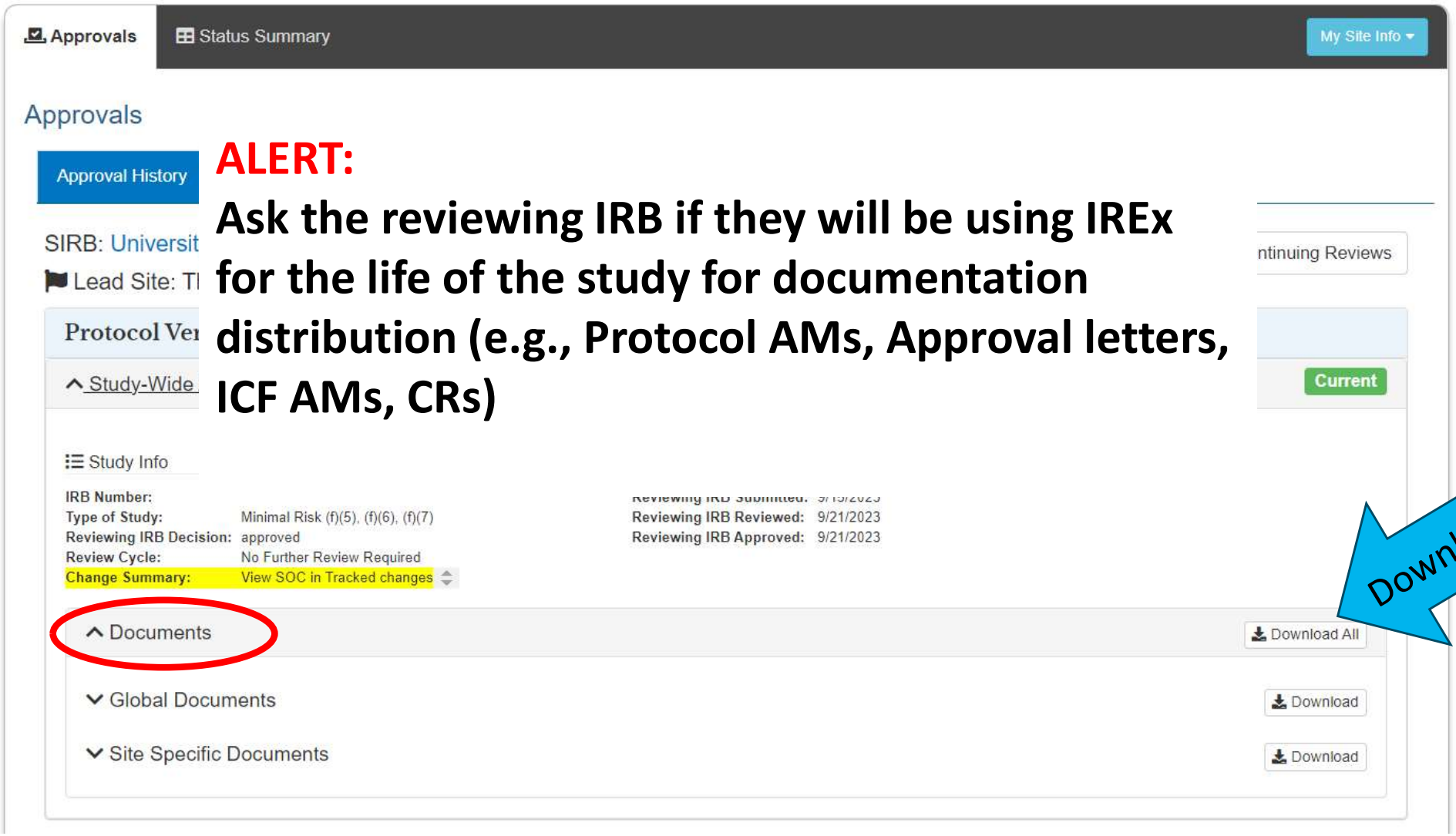
After all steps are completed (including the PI Survey), the Relying Site may submit to the Reviewing IRB for review. Study teams will receive an email notification from IREx when the site's approval is available in IREx.

Downloading Documents

When the study has been approved by the Reviewing IRB, the Relying Site may download from IREx:

- Global Documents (e.g., ICF templates, IRB approval letter)
  - ICFs templates may be used to create site specific ICFs
  - Contact study team for editable templates
- Site-specific Documents

Check-in with the Reviewing IRB to find out if IREx will be used through the life of the study for document distribution.


Approvals
Status Summary
My Site Info
Approvals
Approval History
ALERT:
Ask the reviewing IRB if they will be using IREx for the life of the study for documentation distribution (e.g., Protocol AMs, Approval letters, ICF AMs, CRs)
SIRB: Universit
Lead Site: TI
ntinuing Reviews
Protocol Ver
Study-Wide
Current
Study Info
IRB Number:
Type of Study: Minimal Risk (f)(5), (f)(6), (f)(7)
Reviewing IRB Decision: approved
Review Cycle: No Further Review Required
Change Summary: View SOC in Tracked changes
Reviewing IRB Reviewed: 9/21/2023
Reviewing IRB Approved: 9/21/2023
Documents
Download All
Download
Global Documents
Download
Site Specific Documents
Download

When CHLA is serving as the Reviewing IRB….

Requests for CHLA to serve as the Reviewing IRB

Requests for CHLA IRB to serve as Reviewing IRB, begins with email to **irbreliance@chla.usc.edu** with the following information:

- Funding source
- The research to be performed – is the same study protocol being followed at all sites?
- The institutions that will be conducting the research (Relying Sites)

The HSPP office will determine whether CHLA may serve as the reviewing IRB. If so, the PI will be asked to use either IREx or the SMART IRB Reliance platform to request and document reliance.

CHLA is Serving as the Reviewing IRB

When CHLA is using IREx:

- The study contact will create and submit an initial study application in iStar (please notify CHLA Reliance through email IRBReliance@chla.usc.edu)
- IRB Reliance Administrators will used the information in the iStar application to create the study in IREx.
- IRB Reliance Administrators will add the study manager to IREx.

When CHLA is using the SMART IRB Reliance System:

- CHLA PI or designee (lead site) will create the study
- IRB Reliance Administrators will review all reliance forms and issue the Reliance determination letter.

Submit Relying Site's "Reliance Packet" in iStar

Step 4: Adding Relying Sites to the Approved CHLA Protocol

1. The CHLA IRB requires submission of an amendment to the approved CHLA study to add all of the Relying Sites that will be conducting the research.

2. For each Relying Site, a "reliance packet" must be submitted with the amendment. All of the documents contained within the reliance packet should be submitted as a zip file in the iStar amendment for each Relying Site. Do not submit any Relying Site documents via amendment until all of the documents are available and complete for that site. The completed reliance packets for multiple sites may be grouped within a single amendment.

3. The reliance packet consists of the following:

- All consent forms and recruitment materials with Relying Site (local context) specific edits
    - The Relying Site may make local context changes to the recruitment and consent forms, which are highlighted in yellow on the CHLA approved master consent and recruitment template forms.
    - The CHLA study team must compare each of the Relying Site's consent forms and recruitment materials against the CHLA master consent form templates, CHLA master recruitment templates, and the information included in the completed CHLA Institutional Profile form. This is necessary to ensure only local context specific edits were made by the Relying Site. Please assure that no required language in the forms have been changed by the Relying Site.
- Completed **Institutional Profile** Sheet.

When CHLA is serving as a Relying Site….

CHLA is the Relying Site

An IRB Reliance Administrator will email the PI to confirm their participation in the study.

When Reviewing IRB is using IREx:

- The PI will be asked to create and submit a ceded study application in iStar.
  - Information in the iStar application will be used to complete the HRP Survey in IREx

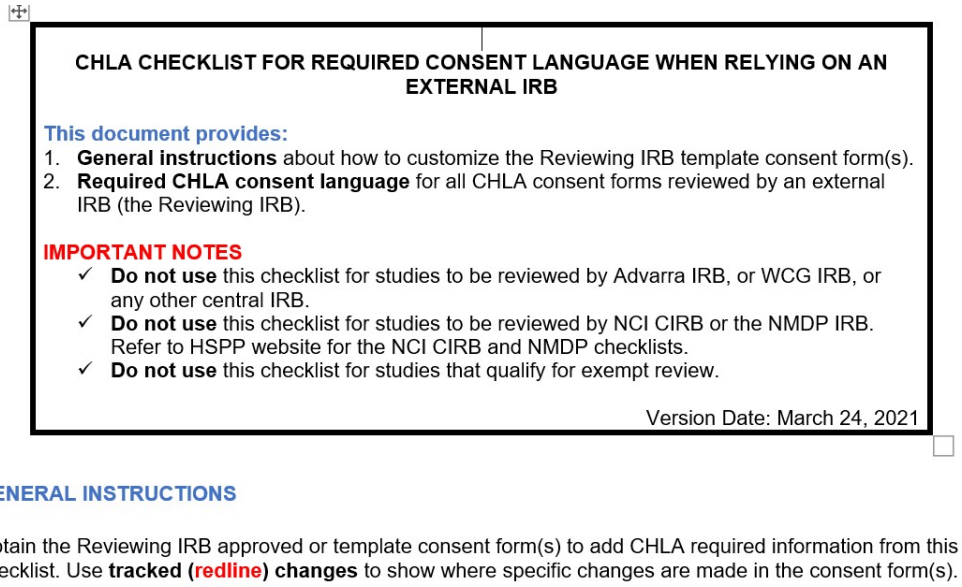
When Reviewing IRB is using the SMART IRB Reliance System:

- IRB Reliance Administrators will make the Reviewing IRB aware of CHLA requirements by uploading the following documents:
  - External IRB Consent Form Checklist
  - CHLA Institutional Profile Information Sheet (CHLA Local Context)

External IRB Consent Form Checklist

When the IRB approved consent and assent form template become available use them to:

create site-specific consent and assent forms using the External Consent Form Checklist.



CHLA CHECKLIST FOR REQUIRED CONSENT LANGUAGE WHEN RELYING ON AN EXTERNAL IRB

This document provides:

1. **General instructions** about how to customize the Reviewing IRB template consent form(s).
2. **Required CHLA consent language** for all CHLA consent forms reviewed by an external IRB (the Reviewing IRB).

IMPORTANT NOTES

- ✓ **Do not use** this checklist for studies to be reviewed by Advarra IRB, or WCG IRB, or any other central IRB.
- ✓ **Do not use** this checklist for studies to be reviewed by NCI CIRB or the NMDP IRB. Refer to HSPP website for the NCI CIRB and NMDP checklists.
- ✓ **Do not use** this checklist for studies that qualify for exempt review.

Version Date: March 24, 2021

GENERAL INSTRUCTIONS

Obtain the Reviewing IRB approved or template consent form(s) to add CHLA required information from this checklist. Use **tracked (redline) changes** to show where specific changes are made in the consent form(s).

They will be submitted (along with other documents) in the **initial study application in iStar to request clearance to cede**.

Please download the checklist form → HSPP website for the most recent version.

Relying on Other External IRBs

- Reliance on Another IRB for Review and Oversight
- External IRB Consent Form Checklist
- NMDP IRB Consent Form Checklist
- NCI CIRB Boilerplate for Consent Forms
- CHLA Institutional Profile Information Sheet (CHLA Local Context)

Submit IRB Approved CHLA-specific Consent Forms, etc.

Submit in an iStar Amendment application:

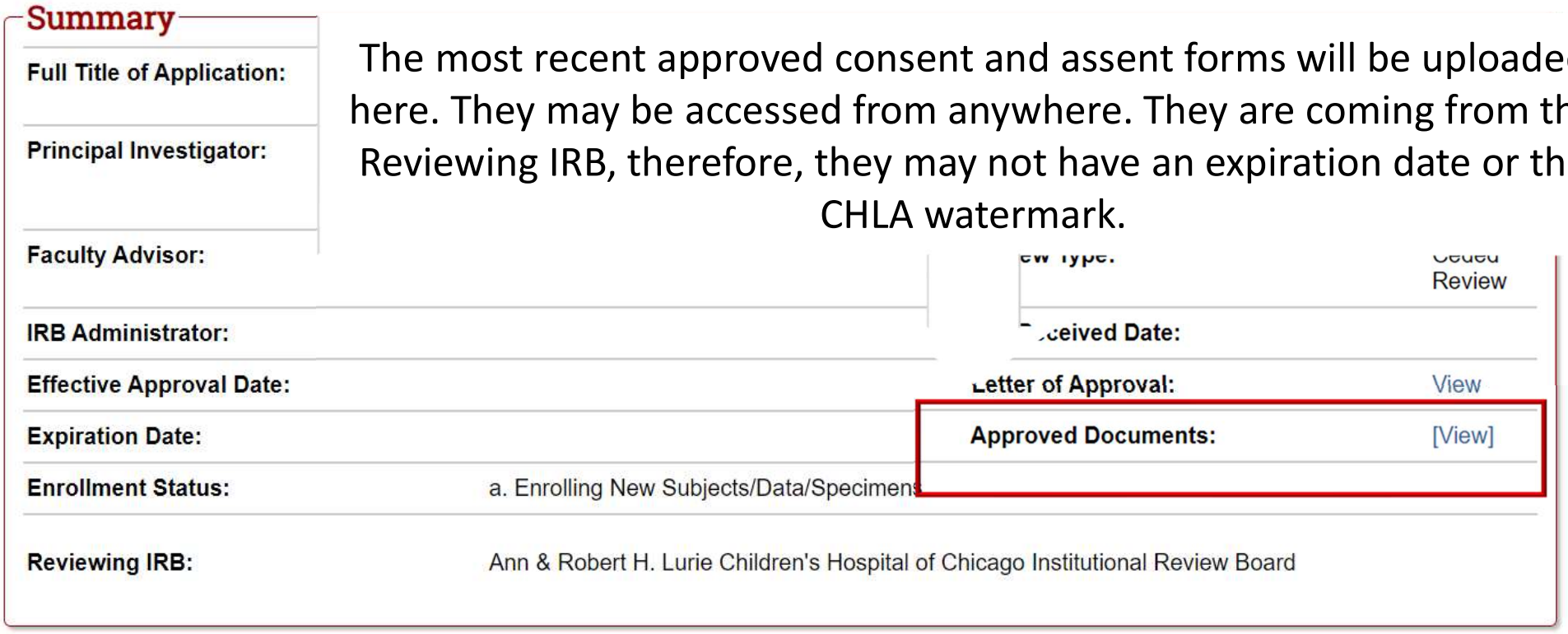
- Reviewing IRB approval letter
- Reviewing IRB approved CHLA consent and assent forms
- Any approved CHLA specific recruitment or subject materials

IRB Reliance Administrators will verify required language in consent and assent forms before releasing them for use.

Submit Additional Amendments

- CHLA study teams are responsible for submitting **additional amendments** to the CHLA ceded review application in iStar when **new approval letters and study documents** are issued by the Reviewing IRB.
  - Continuing Review approvals are submitted in iStar in an Amendment application.
- The purpose of filing amendments to the CHLA ceded review application is to ensure currently approved documents appear in iStar and OnCore for use by the CHLA study team

Accessing CHLA-Specific Consent and Assent Forms in iStar



The most recent approved consent and assent forms will be uploaded here. They may be accessed from anywhere. They are coming from the Reviewing IRB, therefore, they may not have an expiration date or the CHLA watermark.

QUIZ - True or False

- When requesting that CHLA serve as the Reviewing IRB, the PI may email irbreliance@chla.usc.edu.

  TRUE

- When CHLA is the **Reviewing IRB**, reliance requests and documentation must occur through email.

  FALSE – please use IREX or the SMART IRB Reliance System

- When CHLA is the **Relying site**, the Reviewing IRB decides whether to use IREx, SMART IRB Reliance System or email to request and document reliance.

  TRUE

- A communication plan may be requested by the **Relying site**.

  TRUE

Resources: SMART IRB Reliance System

Reliance Walkthrough Video:

https://smartirb.org/reliance/

Review the Reliance Checklist and prepare study materials prior to logging in

SMART IRB Communication Plan Template
https://smartirb.org/resources/#C

Resources: IREx

Request an IREx demonstration:

https://redcap.vanderbilt.edu/surveys/?s=H8XMMD7KTX

Downloading documents from IREx:

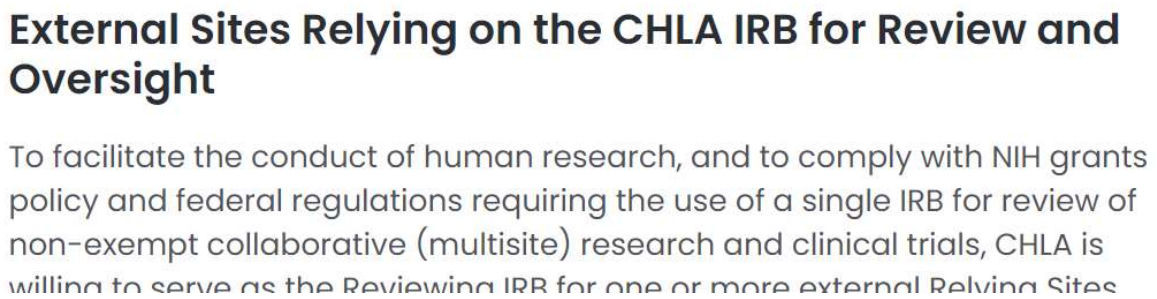
https://www.irbexchange.org/p/participating-site-study-teams/

Guidance for Study Manager:

https://www.irbexchange.org/p/reviewingirb/

Resources: CHLA

- https://www.chla.org/research/human-subjects-protection-program-hspp-and-institutional-review-board-irb



External Sites Relying on the CHLA IRB for Review and Oversight

To facilitate the conduct of human research, and to comply with NIH grants policy and federal regulations requiring the use of a single IRB for review of non-exempt collaborative (multisite) research and clinical trials, CHLA is willing to serve as the Reviewing IRB for one or more external Relying Sites

- https://www.chla.org/research/human-subjects-protection-program-hspp-and-institutional-review-board-irb/hspp

HSPP Ceded Review Checklists and Forms

The information below is for relying on an external IRB. There is information, guidance and checklists that must be used to customize sponsor template

Office Hours

Ceded Review Office Hours with Joanna Balducci

Every other Thursday from 11am-12pm

Click here to join the meeting

Office hours with IRB Reliance Administrators:

Liz Stefani

3rd Wednesday of every month 1pm– 2pm

Click here to join the meeting

Veronica Jimenez

1st Monday of every month 11am-12pm

Click here to join the meeting

Questions?