

THE SABAN RESEARCH

### **CEDED REVIEW SUBMISSIONS:**

### WHAT GUIDANCE DOCUMENTS TO USE AND WHAT TO SUBMIT IN ISTAR

DEEBRA SMITH, MPH, CCRP, CIP

HUMAN SUBJECTS PROTECTION PROGRAM (HSPP)

## **Learning Objectives**

Overview of the CHLA Ceded Review Process Independent (Central) IRBs: Advarra, Sterling, & WCG

External IRBs: BCH, CHOP, NMDP, UCLA, etc. National Cancer Institute Central IRB (CIRB)

Completing the Initial iStar Application Amendment, Continuing Review, & Reportable Event Applications

**Tips & Reminders** 

### **Overview of the CHLA ceded review process**

- All studies ceding review to another IRB, must first be cleared by the CHLA HSPP office **BEFORE** CHLA investigators can submit to the Reviewing IRB.
- The CHLA clearance process involves:
  - Submitting a ceded review application to CHLA in iStar
  - Ceded Application undergoes any department/division review & approval and are subject to other ancillary reviews & approvals (e.g., Radiation Safety, COIRC, etc.).
  - CHLA HSPP staff performs an administrative review\*
  - CHLA HSPP staff clears the application and issues a clearance letter
- CHLA investigators then submit the CHLA clearance letter, and when applicable, cleared documents (e.g., consent forms) to the Reviewing IRB for review & approval
- CHLA investigators submit an Amendment Application to CHLA to submit the Reviewing IRB's approval letter and the approved CHLA site specific materials



### **Overview of the CHLA ceded review process**

Right now, CHLA has 3 paths for ceding review to another IRB. Those paths are:

- Independent IRBs
  - Industry Sponsored Multi-Center Clinical Trials
  - Advarra IRB, Sterling IRB, and WCG IRB
- External IRBs
  - Multi-site studies
  - BCH, CHOP, NMDP, Stanford University, UCLA, & many others
- National Cancer Institute Central IRB (CIRB)
  - Children's Oncology Group (COG) studies
  - Pediatric Brain Tumor Consortium (PBTC) studies





# INDEPENDENT IRBs: ADVARRA, STERLING, & WCG

HUMAN SUBJECTS PROTECTION PROGRAM (HSPP)

- CHLA allows IRB review to be performed by an independent (central) IRB when a Sponsor is using one for **industry sponsored multi-center clinical trials**.
- When you are contacted by a Sponsor to join a study, you should ask them if they are using an independent (central) IRB.
  - ➢ If YES: Ask what independent (central) IRB they are using.
  - >CHLA has master agreements & review procedures in place with Advarra, Sterling, & WCG
  - If Advarra, Sterling, or WCG ARE NOT being used by the Sponsor, you should email irbreliance@chla.usc.edu for details and information to rely on the IRB the Sponsor is using
- If the Sponsor IS NOT using an independent (central) IRB, then the study should be submitted for review by the CHLA IRB (not a ceded application).



### Use these documents to prepare your CHLA submission:

- Guidance Document: Instructions for Making a Submission to a Central IRB for Industry Sponsored Multi-Center Clinical Trials
- Template Document: Key Information Summary Section for Consent Forms (if applicable)
  - Only required when the Sponsor's consent templates **DO NOT** include a key information section\*
  - CHLA only requires key information in all main study consent forms (not assent forms, pregnancy partner, or sub-study/optional study consent forms)
  - Should only be 1 to 1  $\frac{1}{2}$  pages in length
  - Follow the instructions in the template
- Template Document: Disclosure of Financial Conflicts of Interest Statement for Consent Forms (if applicable)
  - Only required if any member of the study team has a conflict of interest (COI), a Conflict Management Plan (CMP) has been executed, and the CMP requires COI disclosure language in the consent form(s)
  - Follow the instructions in the template



### **Submit these documents (Initial Clearance):**

- Protocol (**REQUIRED**)
- Key Information Summary (if applicable)
- Financial Conflict of Interest Statement (if applicable)
- CHLA COIRC Conflict Management Plan (CMP) (if applicable)
- CHLA Site Specific Recruitment Tools (e.g., flyers) (if applicable)

Sponsor provided recruitment materials do not need to be submitted (e.g., brochures)

- Study teams **DO NOT** need to upload the Sponsor's consent & assent templates.
- Study teams **DO NOT** need to create consent & assent forms for use at CHLA **IF** the Sponsor has templates.
- Advarra, Sterling, & WCG IRBs will use the Sponsor's templates to create the CHLA forms.
- **QUESTION**: What do I do if the Sponsor doesn't have an assent form template?
  - Use the CHLA Simplified Assent Form Template on the HSPP website. This should only be used if the Sponsor **does not** have an assent form template.
  - Upload the CHLA Simplified Assent Form in iStar so that it can be cleared by HSPP staff

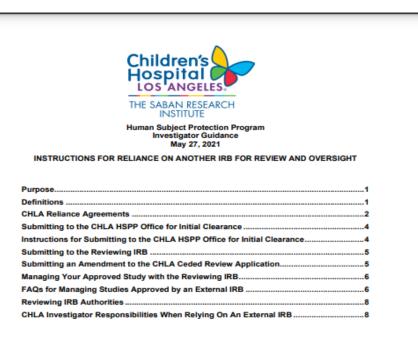


## EXTERNAL IRBs: BCH, CHOP, UCLA, Stanford, etc.

HUMAN SUBJECTS PROTECTION PROGRAM (HSPP)

# Use these documents to prepare your CHLA submission:

- Guidance Document: Instructions for Reliance on Another IRB for Review and Oversight
- External IRB Consent Form Checklist
- NMDP IRB Consent Form Checklist (NMDP studies only)



### rpose

This document provides detailed information about the CHLA requirements to rely on another IRB for review and oversight.

An IRB reliance agreement is necessary to allow for only one IRB review of multisite research. CHLA has established various IRB reliance agreements to allow an external IRB to serve as the Reviewing IRB for research that is conducted at more than one site. These agreements outline the responsibilities of each organization for IRB review, reporting and research oversight.

#### Definitions

Reliance Agreement: A formal, written document that provides a mechanism for an institution engaged in research to delegate institutional review board (IRB) review to an independent IRB or an IRB of another institution. Institutions that are engaged in human



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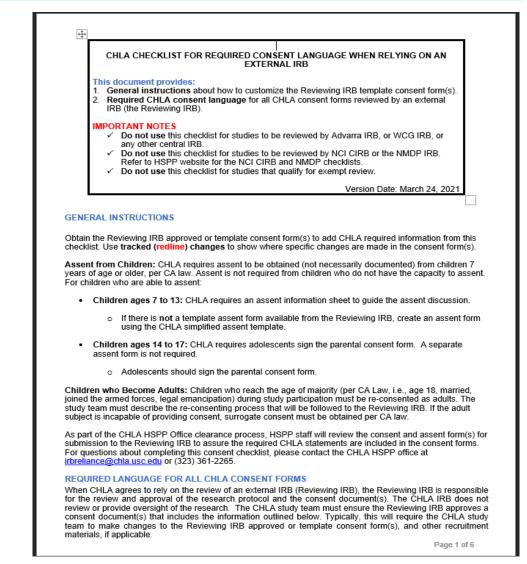
**Submit these documents (Initial Clearance):** 

- Protocol (REQUIRED)
- Reviewing IRB's Approval Letter (REQUIRED if the study is already approved)
- Reviewing IRB's Template Consent and Assent Forms (REQUIRED)
- CHLA Site Specific Consent & Assent Forms with required CHLA language (REQUIRED)
- CHLA Addendum Form for Subjects turning 18 years old (if applicable)
- CHLA Site Specific Recruitment Tools (e.g., flyers) (if applicable)
- CHLA COIRC Conflict Management Plan (CMP) (if applicable)



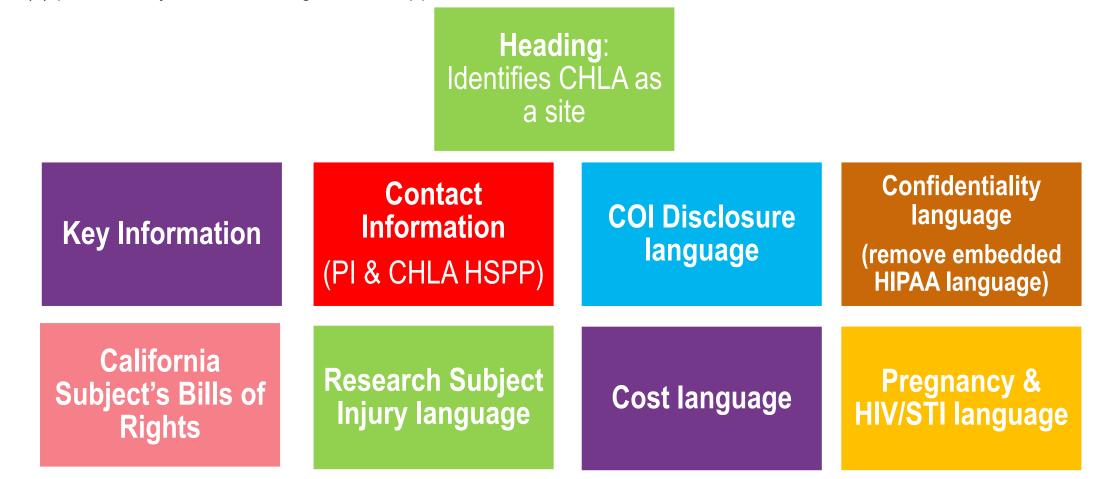
### Customizing the Reviewing IRB's Consent & Assent Forms

- Use the consent and assent templates provided by the Reviewing IRB
  - You should only use the CHLA Simplified Assent Form template, if the Reviewing IRB doesn't have an assent form template
- Use the correct External Consent Form Checklist to customize the CHLA Consent Forms
  - **DO NOT** upload the checklist into iStar





Using the correct **External Consent Form Checklist**, the following edits should be made to the template consent form(s) provided by the Reviewing IRB, as applicable:





### **Customize the Reviewing IRB's Template Assent Form(s):**

- Name & contact information for the PI
- Pregnancy and HIV/STI language (if applicable)
  - **Pregnancy**: Your pregnancy test results will not be shared with your parent(s).
  - **HIV/STI**: If your HIV/Sexually Transmitted Infection (STI) test is positive and you are at least 12 years of age, we will not share the results with your parent(s) unless you tell us we can. If your HIV/Sexually Transmitted Infection (STI) test is positive and you are under the age of 12, the results will be shared with your parent(s).



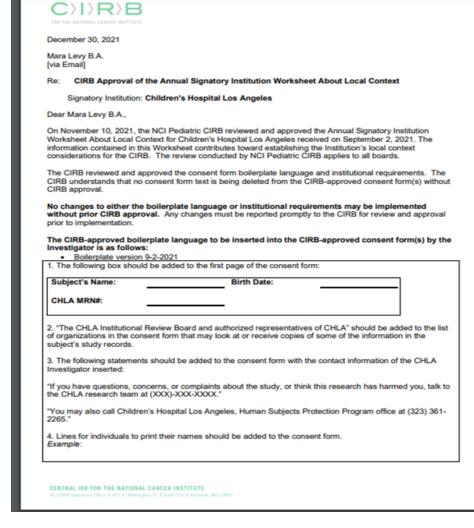
# NATIONAL CANCER INSTITUTE CENTRAL IRB (CIRB)

HUMAN SUBJECTS PROTECTION PROGRAM (HSPP)

### **CIRB**

### Use these documents to prepare for your CHLA submission:

- Guidance Document: There is no guidance document available for CIRB studies.
- NCI CIRB Boilerplate for Consent Forms (aka Local Context Worksheet)





## CIRB

### **Submit these documents in the iStar Application (initial clearance)**:

- CIRB Zip file
- CIRB Approval of Study-Specific Worksheet (if applicable)
- CHLA Site Consent Form(s)
- CHLA Simplified Assent Form(s)
- Youth Information Sheet(s) (YIS) if you are using these **instead** of the CHLA Simplified Assent Form



# CIRB: Customizing the Consent Forms

Use the approved consent templates on the CTSU website

Use the local context worksheet on the HSPP website to make the allowable edits The CIRB-approved boilerplate language to be inserted into the CIRB-approved consent form(s) by the Investigator is as follows:

• Boilerplate version 9-2-2021

1. The following box should be added to the first page of the consent form:

Subject's Name:

Birth Date:

CHLA MRN#:

2. "The CHLA Institutional Review Board and authorized representatives of CHLA" should be added to the list of organizations in the consent form that may look at or receive copies of some of the information in the subject's study records.

3. The following statements should be added to the consent form with the contact information of the CHLA Investigator inserted:

"If you have questions, concerns, or complaints about the study, or think this research has harmed you, talk to the CHLA research team at (XXX)-XXX-XXXX."

"You may also call Children's Hospital Los Angeles, Human Subjects Protection Program office at (323) 361-2265."

### CIRB

### **Customizing the Consent Form(s)**

• Add the Subject's Name identifier box on the first page

Subject's Name:	Birth Date:	
CHLA MRN#:		

- "What about privacy?" section
  - Children's Oncology Group and research partners
  - Representatives of the National Cancer Institute (NCI), Food and Drug Administration (FDA), and other U.S. and international regulatory agencies involves in overseeing research
  - The CHLA Institutional Review Board and authorized representatives of CHLA
  - Pediatric Central Institutional Review Board (CIRB) of the National Cancer Institute
  - · The study sponsor and any drug company supporting the study now or in the future



### CIRB

### **Customizing the Consent Form(s)**

### • Complete the "Whom do I call if I have questions or problems?" section

For questions about the study or if you have a research related problem or if you think you have been injured in this study, you may contact Dr. Jane Doe or your doctor at (323) 111-1111.

If you have any questions about your rights as a research participant or any problems that you feel you cannot discuss with the investigators, you may call the IRB Administrator at Children's Hospital Los Angeles, Human Subjects Protection Program office at (323) 361-2265.

If you have any questions or concerns that you feel you would like to discuss with someone who is not on the research team, you may also call the Patient Advocate at (323) 361-2265.

### • "Where do I get more information?" section

If you have questions, concerns, or complaints about the study, or think the research has harmed you, talk to the CHLA research team at (323) 361-2121.

You may also call Children's Hospital Los Angeles, Human Subjects Protection Program office at (323) 361-2265.



### CIRB: Customizing the Consent Forms

Signature sections: Use the signature sections in the approved CIRB templates. However, you are allowed to add in the "print name line" and any signature sections for special populations that are missing (e.g., legally authorized representatives consenting for adults lacking consent capacity, witnesses for enrolling non-English speaking populations).

Participant	_Date
Printed Name of Participant	
Parent/Guardian	
Printed Name of Parent/Guardian	
Parent/Guardian	
Printed Name of Parent/Guardian	
Legally Authorized Representative	
Printed Name of Legally Authorized Representative	
Physician/PNP obtaining consent	Date
Printed Name of Physician/PNP obtaining consent	
Witness	Date
Printed Name of Witness	



### CIRB

### **Creating the Assent Form(s) or Customizing the Youth Information Sheets (YIS)**

- CHLA Simplified Assent Form (version 9-22-2020)
  - This is the version currently approved by CIRB
  - Must be submitted to the CIRB for approval before use
- Youth Information Sheet(s): Can be used when available on the CTSU website and the research involves children 7-13 years old and/or adults lacking the consent capacity.
  - If you choose to use the YIS, if must be the YIS that corresponds to the current protocol version.
     ➤ Example: If the protocol version is 1/1/22 but is 1/1/21 on the YIS, then the YIS can not be used.
  - You can only add in a signature section (without the checkbox)

Example:		
Signature of Subject (if able to sign)	Date	_



## COMPLETING THE iStar APPLICATION

HUMAN SUBJECTS PROTECTION PROGRAM (HSPP)

- Ensure that ALL study personnel have current CITI certifications
  - The CHLA HSPP office does not monitor/track HIPAA certifications
  - Visit the HSPP website if you have any questions about what training needs to be completed

2.1.	.1. Study Personnel and their roles:									
		Last Name	First Name	Organization	Study Role	Certifications	Obtain Consent	Interact with Participants	Access Identifiable Data	Manage Audit Access to PHI/ePHI (CHLA Only)
	View	Smith	Deebra	CHLA Human Subjects Protection Program	Principal Investigator	HS GCP HIPAA	yes	yes	yes	
	View	Smith	Deebra	CHLA Human Subjects Protection Program	Study Contact Person	HS GCP HIPAA	yes	yes	yes	yes

• Identify the funding sources

- **Item 4.1.1 - Is CHLA the Prime Awardee?**: If "yes", you will need to talk to the IRB Regulatory Manager to determine whether the study can be ceded since CHLA is the primary awardee of the NIH funds. This should be done **before** the iStar application is completed and submitted to the CHLA HSPP.

- Identify the correct reviewing IRB
  - If you select "Other," **DO NOT** list SMART IRB or IREx as the Reviewing IRB. These are **not** IRBs.

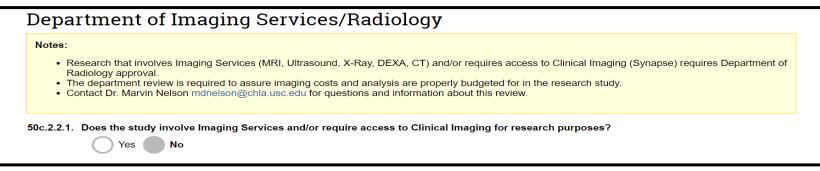


- Identify any parts of the study or any study procedures CHLA is not participating in (e.g., sub-studies, optional studies, optional procedures)
- Describe the re-consenting plan for minor subjects turning 18 years old while participating in the study
  - CA Law requires that children reaching the age of majority during study participation must be re-consented as adults for their continuing participation.
  - You should consult with the reviewing IRB and describe in the iStar application the re-consenting process that will be followed by the reviewing IRB. They may want these subjects to be re-consented for their continuing participation with the full consent form rather than an addendum form.
- Ensure <u>ALL</u> study personnel have a current COI disclosure on file
  - CHLA policy COMP 021.0 requires ALL study team members to have a current COI disclosure in DiSClose.
  - Keep your disclosures up to date to prevent delays.

Role	COI Annual Disclosure Status	Conflicts
Principal Investigator	Current: due on 3/25/2023	No conflicts identified
Co-Investigator	Current: due on 3/29/2023	No conflicts identified
Co-Investigator	Current: due on 1/24/2023	No conflicts identified



- Item 26.4 Will identified data/specimens be released to a 3<sup>rd</sup> party?: Should be "yes" because it is most likely that coded data/specimens is being released from CHLA.
- Answer <u>ALL</u> the questions in Section 50
  - The iStar application will be routed/flagged based on how you answer the questions
  - Contact the department/committee if you have questions or need information about their review process





- It's impossible to list all the documents that should not be submitted in the iStar application that you receive from the Reviewing IRB.
- However, the following documents are examples of what should **NOT** be submitted in the iStar application:
  - Investigator's Brochure/Package Inserts
  - Questionnaires/surveys, focus group/interview scripts
  - Data Collection Forms
  - Patient Cards
  - Reviewing IRB's roster
- Documents received from the Reviewing IRB must be retained in your study/regulatory binders.







# AMENDMENTS, CONTINUING REVIEWS, REPORTABLE EVENTS, & CLOSURES

HUMAN SUBJECTS PROTECTION PROGRAM (HSPP)

### **Amendment Applications**

- Amendment Applications (AM) are REQUIRED for the following:
  - Study personnel updates (PI, Co-PIs, consenting privileges)
  - New/updated protocol(s), ICF(s), CHLA recruitment tool(s), CMPs
  - Enrollment status change
  - When continuing review approval is granted by the Reviewing IRB
- Documents to include in AM applications:
  - New/updated protocol(s), ICF(s)\*, CHLA recruitment tool(s), CMPs
    - ICF: Only submit approved/stamped forms. If you are making changes to our required local context, then
      you will need to submit the requests to <u>irbreliance@chla.usc.edu</u> for review and approval by the IRB
      Regulatory Manager
  - Reviewing IRBs approval letter(s)
- FAQ: Can I use the documents approved by the Reviewing IRB before obtaining clearance of the AM by the CHLA HSPP? →No. The documents need to be cleared by the CHLA HSPP office before use so that we can ensure that local context language has not been changed in the ICFs and to ensure that approvals from CHLA departments/divisions (e.g., Lab Medicine) and ancillary committees (e.g., Radiation Safety) are not needed.



## **Continuing Review & Reportable Event Applications**

- Continuing Review (CR) applications ARE NOT REQUIRED
  - CHLA doesn't put an expiration date on the clearance letter or in iStar (except for CIRB studies)
  - When the Reviewing IRB approves a continuing review, an AM must be submitted in iStar
- Reportable Event applications ARE NOT REQUIRED
  - **Do not** submit any RE applications in iStar for ceded studies
  - CHLA clearance or CHLA IRB review is not required for reportable new information or events that occur at CHLA
  - All events should be submitted to the Reviewing IRB according to their requirements
- Once a submission for a reportable event has been made to the Reviewing IRB, you should send an email to <u>irbreliance@chla.usc.edu</u> with the following:
  - Details on the submission made to the Reviewing IRB
  - The Reviewing IRB's review of the event and its determination(s)



## **Study Closures**

- Study closure reports **do not** require CHLA clearance.
- Use the "Close Study IRB" function in iStar to close the study.

 iStar will issue a Close Study Letter

Withdraw or Close

Close Study IRB

USCUniversity of Southern California	Children's Lac+USC	iStar
СН	ILA Human Subjects Protection Prog	gram
Date: Apr 30, 2022, 08:40am		
Ensure CUI & Damage Cathings		
From: CHLA Human Subjects	s Protection Program	
TITLE OF STUDY:	s Protection Program	
	s Protection Program	
TITLE OF STUDY: The final report application fo	or the above-named study was auto-a the information provided, all researc	
TITLE OF STUDY: The final report application fo 2022, 08:40am. According to completed. The iStar applicati This is an auto-generated ema	or the above-named study was auto-a the information provided, all researce ion is now closed. ail. Please do not respond directly to t is manner cannot be answered. If you	h activities have been this message using the "reply"
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## **TIPS & REMINDERS**

HUMAN SUBJECTS PROTECTION PROGRAM (HSPP)

## **Tips & Reminders**

- Use the current guidance documents, templates, & consent form checklists on the HSPP website
- Have the guidance document & consent form checklist open while working on the iStar application
- When removing embedded HIPAA language, you can use the CHLA Research HIPAA authorization form to help you find HIPAA language
- Make sure you submit the consent and assent forms cleared by the CHLA HSPP to the Reviewing IRB for review and approval
- Check the consent/assent forms once approved by the Reviewing IRB before submitting them in iStar
- Contact your IRBA or the HSPP Office if you have any questions
- Contact the Reviewing IRB if you have any questions about consent, permission, assent, and/or HIPAA and reporting requirements



All the guidance documents, worksheets and templates mentioned today are available on the HSPP website: https://www.chla.org/rese arch/hspp-ceded-reviewchecklists-and-forms



### 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 or lead site consent forms so that they include CHLA specific language.

### **Relying on a Central IRB**

- Instructions for Making a Submission to a Central IRB for Industry Sponsored Multi-Center Clinical Trials
- Template Document: Key Information Summary Section for Consent Forms
- Template Document: Disclosure of Financial Conflicts of Interest Statement for Consent Forms
- Reference Document: Advarra IRB Getting Started Guide
- Reference Document: WCG IRB Getting Started Guide
- Reference Document: Sterling IRB SilverLink Getting Started Guide
- Presentation: New Connexus Overview for WCG IRB
- Presentation: Initial Review Submissions to WCG IRB
- Presentation: Managing Studies Approved by WCG IRB
- Advarra IRB Resources
- WCG IRB Resources
- Sterling IRB Resources

### **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)

	INDEPENDENT IRBS	EXTERNAL IRBS	NCI CIRB
Use these Guidance Documents and templates (as applicable):	<ul> <li>Instructions for Making Submission to a Central IRB for Industry Sponsored Multi- Center Clinical Trials</li> <li>Template Document: Key Information Summary Section for Consent Forms</li> <li>Template Document: Disclosure of Financial Conflicts of Interest Statement for Consent Forms</li> </ul>	<ul> <li>Instructions for Reliance on Another IRB for Review and Oversight</li> <li>External IRB Consent Form Checklist</li> <li>NMDP IRB Consent Form Checklist (NMDP studies only)</li> </ul>	<ul> <li>No guidance document available</li> <li>NCI CIRB Boilerplate for Consent Forms</li> </ul>
Submit these documents in iStar for Initial Clearance (as applicable):	<ul> <li>Protocol</li> <li>Key Information Summary</li> <li>CHLA Simplified Assent Form</li> <li>Financial COI Statement</li> <li>CHLA Recruitment Tools</li> <li>CHLA CMP</li> </ul>	<ul> <li>Protocol</li> <li>Reviewing IRB's consent &amp; assent templates</li> <li>Reviewing IRB's recruitment template(s)</li> <li>CHLA Consent, Permission, Assent, Addendum Forms</li> <li>CHLA Recruitment Tool(s)</li> <li>Reviewing IRBs Approval Letter</li> <li>CHLA CMP</li> </ul>	<ul> <li>CIRB zip file</li> <li>CIRB Site Specific Worksheets</li> <li>CHLA Consent, Permission, Assent forms</li> <li>CIRB Youth Information Sheets</li> <li>CHLA CMP</li> </ul>
Submit these documents to CHLA via Amendments (as applicable)	<ul> <li>New/updated protocol</li> <li>New/updated CHLA Consent, Permission, Assent, Addendum forms</li> <li>New/updated CHLA Recruitment Tools</li> <li>Reviewing IRB's Approval Letter(s)</li> <li>New/updated CHLA CMP</li> </ul>	<ul> <li>New/updated protocol</li> <li>New/updated CHLA Consent, Permission, Assent, Addendum forms</li> <li>New/updated CHLA Recruitment Tools</li> <li>Reviewing IRB's Approval Letter(s)</li> <li>New/updated CHLA CMP</li> </ul>	<ul> <li>CIRB zip file</li> <li>New/updated CHLA Consent, Permission, Assent forms</li> <li>New/updated CIRB Youth Information Sheets</li> <li>New/updated CHLA CMP</li> </ul>



THE SABAN RESEARCH INSTITUTE

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