Monday Morning Practice Pearls #40

What does it mean to close a study with the IRB?

There are 3 reasons a study is closed with the IRB:

1. Routine study closure
2. IRB terminates a study
3. Early/premature termination of a study

Routine Study Closure

A routine study closure occurs when research-related interventions or interactions with human subjects have been completed **AND** for which access to identifiable private information or biospecimens has concluded. This would include having all data analysis complete, all manuscripts accepted for publication, and if a clinical trial, all study results posted to clinicaltrials.gov.

IRB Termination

A convened IRB has the authority to terminate IRB approval of research that is not being conducted in accordance with the IRB's requirements, federal regulation, NIH policy or that has been associated with serious events, serious problems, or unexpected serious harm. The IRB will provide its reason for the suspension or termination of your research activities. When a study is terminated by the IRB the PI must:

- Comply with IRB requirements
- Inform the sponsor, if applicable.
- Coordinate with the IRB to provide a plan for subjects. This includes approval of any materials (e.g., letters, verbal scripts) that will be used to inform subjects about the study termination.

Terminations of IRB approval are reported to OHRP and, if applicable, the FDA.

Early/Premature Closure

Entities other than the IRB (e.g., the PI, DSMB or Sponsor) may request that a protocol be closed early for specific reasons. Circumstances that may warrant early closure include, but are not limited to:

- Unexpected, significant, or unacceptable risk to participants
- Demonstration of efficacy that would warrant stopping
- Insufficient compliance with protocol requirements
- Data that are not sufficiently complete and/or evaluable
- Primary endpoint has been met
- Futility

The premature closure may include ending enrollment of new participants, stopping intervention in previously enrolled participants, or ceasing follow-up for participants who have completed the intervention – or, all of these.

If the study is prematurely closed, the PI should consider the following:

- Inform the IRB and/or sponsor and provide the reason (e.g., premature closure of a pharma study where all participants at NIH are off study and the study is closed to recruitment may be able to be reported at time of CR; if participants are on active treatment, prompt reporting may be required)
- Coordinate with the IRB to provide a plan for subjects. This includes approval of any materials (e.g., letters, verbal scripts) that will be used to inform subjects about the study termination
- Ensure there is appropriate therapy and follow-up for participants
- If the reason for premature closure could be relevant for former study participants, the IRB will determine whether former participants should also be notified.

When the protocol is being prematurely closed, the following materials are submitted via PROTECT, as required:

- Draft communication for participants regarding premature closure of the study, if applicable and not already approved by the IRB, as part of an amendment
- Ensure that research-related interventions or interactions with human subjects have been completed AND for which access to identifiable private information or biospecimens has concluded. This would include having all data analysis complete, all manuscripts accepted for publication, and if a clinical trial, all study results posted to clinicaltrials.gov.
- Any other documents or information that the Office of IRB Operations (IRBO) requests

Reminders:

- Prior to final IRB closure, ensure that:
    - All participating basic science laboratories have completed all the data analysis per the protocol
    - Documentation in CRIS for the off-study date and reason for each patient
    - All subjects have been taken off study in PRES
    - Study sponsor has conducted any final monitoring/closeout visit and confirmed approval to close with the IRB
    - Submit an update/summary of all study activities since the last review (i.e., submit a Continuing Review Form)
- Maintain all research-related documents and consider storing off-site