BACKGROUND

Intramural NCI protocols may be reviewed by a non-NIH IRB or the NCI Central IRB (CIRB), if an authorization agreement (Reliance Agreement) to rely upon an outside IRB as the IRB of Record is in place and approved by the Deputy Director for Intramural Research (DDIR) (or designee) via the Office of Human Subjects Research Protections (OHSRP). This could be a protocol specific reliance agreement or a programmatic reliance agreement. For the purposes of this SOP, “outside IRB” refers to either a non-NIH IRB or the NCI CIRB. For more information about Reliance Agreements see NIH HRPP SOP 20A - Obtaining a Reliance (Authorization) Agreement at the NIH.

PURPOSE

This standard operating procedure (SOP) addresses the internal processes that must be followed when an outside IRB acts as the IRB of record for an NCI protocol that is open to accrual at the NIH Clinical Center (CC).

POLICY

It is the policy of the NCI that any NCI protocol approved and conducted at the NIH Clinical Center by an outside IRB, will be tracked in the NCI IRB system, iRIS™. This procedure ensures tracking and management of the protocol by the NCI and facilitates reviews by other NIH offices, such as scientific review, clearance by the IC DEC, planned and cumulative enrollment, and other ancillary reviews; to ensure compliance with other NIH policies.

PROCEDURES

Step 1: Initial Submission

1. Upon approval by NCI leadership to rely upon an outside IRB, complete the study application in iRIS.

2. In the study application and initial IRB submission form, select first the IRB that will process the protocol (NCI IRB) and then answer “yes” to the question: “Is an outside IRB the IRB of record” and indicate the IRB.

3. Submit the following for review at the time the protocol is submitted to the outside IRB per NIH requirements:
   - Internal CCR Scientific Review
• The DEC clearance form if this is a covered protocol per NIH HRPP SOP 21 - Conflict of Interest Requirements for Researchers and Research Staff.

• The Protocol Resource Impact Assessment (PRIA) form.

• Radiation Safety Committee (RSC) if the protocol involves radiation for the purpose of research. Be sure to use the model consent content inserted into the approved Clinical Center boilerplate consent in your submission to the RSC.

• Office of Biotechnology (OBA) and/or the Institutional Biosafety Committee (IBC) if the protocol involves gene therapy.

4. Upon approval by the outside IRB, submit the following in iRIS:

• All applicable approval documents from 1.1.3 including outside IRB approval

• IRB-approved protocol

• IRB-approved consent(s) and the NIH CC consent document: transfer the model consent(s) content into the CC approved consent template.

• Planned Enrollment Form

• Designation of Reimbursement of Travel and Subsistence (DRTS) form

5. Route the iRIS form for signatures of all NIH Key Study Personnel (KSP), including Branch Chief and Scientific Review Chair.

6. NCI IRB office will process the application and send to the Office of Protocol Services, (OPS), Clinical Center, NIH.

7. OPS will obtain final institutional signatures, post the local consent on the web, assign a protocol ID number to the protocol, and register the protocol on clinicaltrials.gov.

**Step 2: Additional forms if we are the coordinating center of the protocol**

1. Adding outside sites if we are the coordinating center

   • If we are the coordinating center, add other sites to the study application under “participating sites”. Only the outside sites that will be recruiting subjects need to be entered into the study application. When the site is active or begins to enroll subjects, create a revised study application and update the participating site information.

   • Select the protocol in iRIS and submit the “outside IRB documents for multi-institutional trials” form in iRIS. In the submission form, select first the IRB that will process the protocol (NCI IRB) and then answer “yes” to the question: “Is an outside IRB the IRB of record” and indicate the IRB. Complete the information about the newly added site and attach the revised study application.

   • NCI IRB office will process the outside IRB documents form and send to OPS to update www.clinicaltrials.gov with information about the participating site.
Step 3: Study status change

1. If the protocol changes enrollment status in-between the continuing review, select the protocol in iRIS and submit the study status change submission form in iRIS. In the submission form, select first the IRB that will process the protocol (NCI IRB) and then answer “yes” to the question: “Is an outside IRB the IRB of record” and indicate the IRB.

2. NCI IRB office will process the study status change submission form and send to OPS to update www.clinicaltrials.gov with information about the protocol.

Step 4: Amendments

Amendments must be submitted as if being reviewed by the NCI IRB:

1. Select the protocol in iRIS and submit an amendment per the NCI amendment SOP. In the amendment submission form, select first the IRB that will process the protocol (NCI IRB) and then answer “yes” to the question: “Is an outside IRB the IRB of record” and indicate the IRB.

2. Upon approval by the outside IRB, attach the protocol, cover memo, Clinical Center consent, the outside IRB approval documentation and any other required supporting documentation.

3. Email NCI IRB Admin with a notice that the amendment has been submitted. Include the protocol number and iRIS reference number in your email.

4. NCI IRB office will process and send to OPS for the revised consent to be updated and posted to the web for use.

Step 5: Continuing Reviews

Continuing Reviews must be submitted as if being reviewed by the NCI IRB:

1. Select the protocol in iRIS and submit the Continuing Review as per the NCI Continuing Review SOP. In the continuing review submission form, select first the IRB that will process the protocol (NCI IRB) and then answer “yes” to the question: “Is an outside IRB the IRB of record” and indicate the IRB.

2. Upon approval by the outside IRB, attach the Clinical Center consent, the outside IRB approval documentation, the cumulative enrollment form and any other required supporting documentation. In the Continuing Review Submission form in iRIS, state “see attached documentation” in any text fields.

3. Email NCI IRB Admin with a notice that the continuing review has been submitted. Include the protocol number and iRIS reference number in your email.

4. NCI IRB office will process and send to OPS for the revised consent to be updated and posted to the web for use.
Step 6: Unanticipated Problems or Non-compliance

1. Notify the NCI Clinical Director and Deputy Clinical Director (DCD) via email on the same date that you notify the outside IRB. Attach the form that was submitted to the outside IRB.

2. Once the outside IRB has reviewed the action, email the NCI CD and DCD again. Attach the determination by the non-NIH IRB and any applicable minutes of the outside IRB. Maintain this communication in the regulatory file.

For more information see NIH HRPP SOP 16 - Reporting Requirements for Unanticipated Problems, Adverse Events and Protocol Deviations

Step 7: Protocol Closure, Suspension or Termination

Notify the NCI per the NCI Study Closure SOP when the protocol is closed. Notify the NCI CD and DCD immediately via email if the outside IRB suspends or terminates the protocol, for more information see NIH HRPP SOP 11- Suspensions and Terminations of IRB Approval and Administrative Holds.

Protocol closures, suspensions or terminations must be submitted in iRIS as if being reviewed by the NCI IRB:

1. If the IRB of record terminates the protocol, select the protocol in iRIS and submit the closure as per the NCI Study Closure SOP. In the study closure submission form, select first the IRB that will process the protocol (NCI IRB) and then answer “yes” to the question: “Is an outside IRB the IRB of record” and indicate the IRB.

2. Upon approval of the closure by the outside IRB, attach the outside IRB approval documentation and any other required supporting documentation. In the study closure submission form in iRIS, state “see attached documentation” in any text fields.

3. NCI IRB office will process and send to OPS so that, in the event of protocol suspension or closure, the consent can be removed from the web.