SOP#: RPS-5   **NIH IRB Submission and Response: New Protocol**

Version #: 3.2   **Next Review Date: 05/2024**

Approved Date: 05/2022   **Review Interval Period: Biennial**

NCI Clinical Director Signature:

POLICY

All human subjects research that is not exempt must be reviewed, whether as an IRB of record or local context review, by the National Institutes of Health Institutional Review Board (NIH IRB) prior to the initiation of any research activities and must take into account federal regulatory requirements and those of the Office of Human Subjects Research Protections (OHSRP). All protocols submitted to the IRB must first have a scientific review and/or other ancillary approvals as explained below.

SCOPE

This SOP applies to studies in which the NIH Intramural IRB is the IRB of record.

PURPOSE

Identify the steps required for the Center of Cancer Research (CCR), Protocol Support Office (PSO) to submit a new protocol to the NIH IRB and respond to IRB pre-review corrections/stipulations.

RESOURCES

NIH Office of Intramural Research Policies & Guidance website

- Policy 106 – *Ancillary Reviews*
- Policy 204 – *Levels of IRB Review and Criteria for IRB*
- Policy 205 – *Requirements for IRB Submissions*
- 400 Series – Regulatory Protections for Vulnerable Populations, as applicable
- 500 Series – FDA Requirements for Human Subjects Research and Data and Safety Monitoring, as applicable
- 700 Series – International Research Requirements, as applicable

iRIS Helpful Documents website

Institutional Review Board Office (IRBO) Ancillary Reviews website

PROCEDURES

STEP 1: Create Protocol Files and Folders on the Secure Server

- In the Principal Investigator's (PI) specified protocol folder, create a new subfolder titled "Initial IRB Submission." Create and save the following documents in the new "Initial submission" subfolder:
    - Protocol
    - NIH Supplement (if applicable)
    - Informed Consent Document(s)
    - Key Study Personnel List (i.e., KSP or SPP/Study Personnel Page)
    - FDA IND or IDE Safe to Proceed or documentation from the Sponsor that the protocol has been submitted to an active IND (if applicable)
    - Investigator's Brochure (if available) and/or Package Insert (if applicable)
    - Scientific Review Approval Outcome letter from Chief Scientific Officer (CSO)
    - Protocol Resource Impact Assessment (PRIA) approval: If PI has not provided official PRIA approval by the time of the IRB submission, check iRIS. If iRIS notes the PRIA as approved and the outcome letter is not uploaded, contact PRIA Coordinator for the approval document. PRIA is only required when Clinical Center resources will be utilized.

STEP 2: Complete the Study Application

Log-in to iRIS, find the correct project and complete the study application.

Information to note about the study application in iRIS:

- In the section "General Information," verify that the full study title and abbreviated title matches what is written in the protocol/supplement. If this has changed, update in the application and make a note to the IRB on the Initial Review Submission Form.
- In the section "Add all engaged personnel conducting Human Subjects Research (HSR) covered under the NIH FWA and listed in the NIH Enterprise Directory (NED)," review the list of NIH investigators associated with the protocol and their roles. Revise as needed.
    - Be sure to indicate NIH investigators in different sections based on their NED status.
    - Be sure the referral contact the Referral Contact and Research Nurse Study Coordinator are assigned.
    - If an investigator serves in more than one role on the study (e.g., PI who is also Branch Chief or AI who is also study coordinator), ensure that person(s) is assigned to all applicable roles.
- The Study Contact role is for people who should receive all iRIS communications about the study. Be sure to add PSO director and "NCI IC IRB Actions" as study contacts. Anyone can be added as a Study Contact including non-NIH employees.
- Be sure to add Branch Chief (or Clinical Director if PI is Branch Chief) under "designated Branch/IC approval." (This is required for Initial Review only)

- In the section "General Protocol Information," verify that the Précis matches what is written in the protocol/supplement. If the study does not have a precis, but rather a study summary, paste only the study description, objectives and endpoints from the summary into iRIS. This should have been started at the time of SRC submission and may need to be updated.
- In the section "Data Collection for OPS Use," assign the "Z" number. Ask the PI for the primary Z number that will be used to report this protocol. If the PI does not know what this is, refer the PI to their Branch Chief to obtain this information.
- In the section "Interventional Studies for CT.gov" or Observational Studies for CT.gov":
  - Accurately number, label and describe the study cohorts, arms, and outcomes
  - Complete both primary and secondary outcomes
- Fill out other sections as listed/instructed.

STEP 3: Obtain Other Ancillary Approvals from These Groups Before IRB Submission (these ancillary submission processes should be started no later than post-SRC approval)

- Deputy Ethics Counselor (DEC) approval (if this is a covered protocol).
- Radiation Safety Committee (RSC) approval: See IRBO guidance to determine if your protocol meets any of the criteria for RSC submission. Submit the required form using iRIS. Once approval received, save the RSC Approval document in the initial submission folder and the RSC Folder.
- Institutional Biosafety Committee (IBC) approval: If the protocol involves gene therapy, IBC is required. The final approval document should be attached in iRIS with the initial review submission form. Once IBC approval is received, save the approval packet in the initial submission folder and in the IBC folder.

STEP 4: Prepare Other Initial iRIS Submission Forms

- Initial Review Submission Form (see required signatures in Step 6).
- Reimbursement for Travel and Subsistence, previously named the Designation of Reimbursement for Travel and Subsistence (DRTS) form (requires PI signature).
  - The DRTS form is required to be submitted for all studies that involve participant recruitment/enrollment (i.e., that require a signed consent). If reimbursement does not apply, fill out the form and indicate that reimbursement does not apply.
- Additional Study Information Form (PI signature not required).

STEP 5: Send for QC

- Send the JIRA Task to PSO Director for QC.
- Do not route/submit any iRIS forms until after QC.
- Do not create pdf documents until after QC.
- Do not attach protocol or consent to the Initial Review Submission Form until after QC.

Note: If you attach other documents (e.g., IBs, package inserts), ensure that proper naming convention is followed prior to upload.

STEP 6: Complete the Initial Review Submission Form by Attaching the Following Documents in iRIS

- Attach the following required documents to the Initial Review Submission Form:
  - Protocol (MS Word <u>or</u> PDF version of combined NIH Supplement + Protocol)
  - NIH Supplement (if applicable); MS Word as "Protocol with tracked changes)
  - Informed Consent Document(s) (MS Word: tracked – with blue text, and clean – with black text)
  - Scientific Review Approval CSO approval letter
  - Key Study Personnel List/Study Personnel Page
- Attach the following documents to the Initial Review Submission Form (if applicable as explained under step 3):
  - DEC approval
  - Radiation Safety Committee approval
  - Investigator's Brochure/Package Insert
  - IBC approval
  - FDA IND or IDE Safe to Proceed or documentation from the Sponsor that the protocol has been submitted to an active IND
  - Other documents (e.g., Questionnaires, Recruitment material, Participant card, etc.) as applicable
- Assign Initial Review Submission Form for sign-off
  - Required Signatures include PI, Branch Chief (or Clinical Director if PI is Branch Chief)
  - IRB will receive the completed submission once all required signatures are obtained.
- Assign other required forms (from Step 4) for sign-off

<u>Note:</u> Submit the Reimbursement for Travel and Subsistence (DRTS) form for PI signoff after IRB has received the initial protocol submission.

STEP 7: Respond to Pre-review Corrections and/or Stipulations (if applicable)

- Move all documents associated with the initial IRB submission in iRIS to a new subfolder named "Initial Submission." The folder should be dated or numbered (e.g., "YYYYMMDD – Initial Submission" or "1. Initial Submission").
- Create another new subfolder in the Initial submission folder based on the type/timing of the review – e.g., "Response to IRB pre-Review Corrections" or "Response to IRB Review/Stips" – as applicable. The subfolder should be dated or numbered (e.g., "YYYYMMDD – Response to IRB Pre-Review" or "1. Response to IRB Review/Stips" following the same convention chose in the prior bullet).
- Save the Pre-Review Correction iRIS Memo/Email or IRB Stipulation/Request for Correction Memo outcome letter in the subfolder for reference.

- Draft the reply and corrections to required documents as applicable:

  Note: Be sure to update the date of each document to be revised (i.e., both in the file itself as well as the file name with each response to pre-review corrections, stipulations, etc.).

  - In 'tracked changes,' draft the revisions in response to the review corrections/stipulations.
  - Contact PI/team to discuss any items that require their input and/or approval.
    - Note: Save relevant correspondence with PI regarding the review/response input in the amendment sub-folder.
  - Incorporate any outstanding changes at this point (i.e., FDA requests, Sponsor changes) if applicable and **only if necessary** – if a reply to stipulations, IRB will need to send the response back to full board review if additional changes are made outside of those required by the stipulations.

  Note: Please check your sponsor's/manufacturer collaborator's procedures for approval of protocol revisions in response to IRB comments and send for their review as necessary.

- Enter the explanation of the changes for each stipulation/correction in the Review Response Submission Form in iRIS. Indicate section numbers where changes were made in the response text box as applicable.

  Note: Consider adding a Word document to the Response folder where you draft replies to each of the Pre-Review Comments and/or IRB Stipulations for PI/team and QC feedback.

- Review the final version of the revised/response document(s):
  - Review the tracked documents to ensure the changes have been made consistently.
  - Review the changes against the stipulations/corrections itemized in iRIS to ensure. that all changes are documented, and the iRIS Study Application has been updated as necessary.
  - Create final versions of the revised documents (clean and tracked), making sure to update Table of Contents (TOC) and pagination as needed.
- Upload/enter the response in iRIS and "stack" all updated documents by checking out the older version and checking in again for proper stacking. Make sure to enter the document's new Version Date within the document attachment window.
- Assign for signature as indicated in iRIS.

STEP 8: IRB Approval
- Create a new subfolder in the protocol file titled "Approved Documents" and save the following documents:
  - IRB outcome letter(s)
  - Approved Protocol Clean (MS Word version)

- o IRB approved pdf version of the consent (downloaded from iRIS)

  Note: You may also save a copy of the approved, MS Word version of the consent (downloaded from iRIS) in the file for a future amendment, if needed.

- o Study Application and/or IRB Initial Submission Form (If required by Sponsor)
- o If creating an optional Approval Package, include all the above documents

- If this is a CCR Sponsored Study, create a tracked version of protocol and consent with a linked cover memo and notify the IND manager that it is ready for FDA submission (save the copy in the FDA folder).

Note: Notification to other parties (i.e., Sponsor, manufacturer, and/or participating sites) may be required.

STEP 9: Steps for Implementation

Once the protocol is IRB approved:

- Prepare or complete the regulatory binder
- For studies recruiting participants, prepare the Study Initiation Activities Checklist and send this to the team to complete as well as any other requirements (e.g., OSRO forms).
- When the Study Coordinator returns the completed Study Initiation Activities Checklist, signed by the PI, submit the study status change form in iRIS to open the study to enrollment.

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