

#### **SMART TALK**

A Community Forum to Explore Issues Surrounding Single IRB Review

Funded by the NIH National Center for Advancing Translational Sciences through its Clinical and Translational Science Awards Program, grant number 3UL1TR002541-01S1.

### What Is SMART Talk?

#### An approximately monthly forum with:

- Presentations on topics relevant for single IRB review
- Q&A on topic presented as well as questions submitted when participants register

Open and free to anyone with interest

### **Upcoming sessions**

TODAY - Managing Reliance with the SMART IRB Online Reliance System - What's New & Tips from the Experts

January: A Follow-Up Conversation: Getting Ready for the 2020 Single IRB Requirements

February: Review of Personnel Changes: Recommendations from the SMART IRB Harmonization Steering Committee

Single IRB Resources for Researchers

### Key SMART IRB Resources at SMARTIRB.ORG

- Master Reliance Agreement
- Implementation Checklist for use of the SMART IRB Agreement
- Online Reliance System (Helps investigators and institutions request, track, and document reliance arrangements for each study)
- SMART IRB SOP Manual
- Communication Plan for Single IRB Review
- Reviewing IRB Instructions for Relying Institution Point(s) of Contact
- Reviewing IRB Instructions for Relying Site Study Teams

- FAQs for Research Teams Relying on an External IRB
- Overall PI (and Lead Study Team)
   Checklist
- Relying Site Investigator Checklist
- Grant Applications: Template Description of SMART IRB
- Local Considerations: Institutional Profile
- Local Considerations: Protocolspecific Document



## Managing Reliance with the Online Reliance System

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Katherine Sao, Senior Business Analyst, Harvard Catalyst

# Informatics systems supporting reliance has a long history

Various regional systems have been developed and used, including: New England Cede Review, UC Braid, IRBchoice, Wisconsin-Madison, Ohio Collaborative, Texas IRB Consortium and U New Mexico

IRB Rely (2014 - 2016) - Step 1 to a national solution

SMART IRB (2016 - ) - Implementation of a comprehensive suite of tools (information, joining and workflow) and training for the national solution

### Scope of SMART IRB

A wide variety of systems for IRB review used at institutional IRBs (commercial and home grown)

Achieving reliance needs to work with all of them

SMART IRB uses a common agreement (Master Reliance Agreement) and provides a standard reliance Determination Letter to enter into the IRB review systems of all sites involved

Provide workflow support in order to speed achievement of reliance

### Informatics Components

Joinder - allows an institution to sign-on to the SMART IRB Master Reliance Agreement

- Will be the central place for profile info about each institution
- Provides API & human readable list of all participating institutions

Online Reliance System - PI initiated process to identify all sites involved in a study, invite necessary participants, manage workflow and document the results of the process (Determination Letter)

 Uses dashboards, email reminders, "Action Required" prompting within the app and POC monitoring of all requests from their site

#### Metrics

Original release date: May 2017

Requests since then: 2600+

Users: 3500+

Over 50% of requests reach reliance in 3 weeks or less

The systematic workflow of the ORS captures a variety of metrics that can lead to improve the process, e.g.:

- identify steps that may be confusing or simply take longer than expected,
- how often users take advantage of certain features
- where users seem to be making work-arounds

# Getting Started with the Online Reliance System

### Roles in the Online Reliance System

#### Investigator

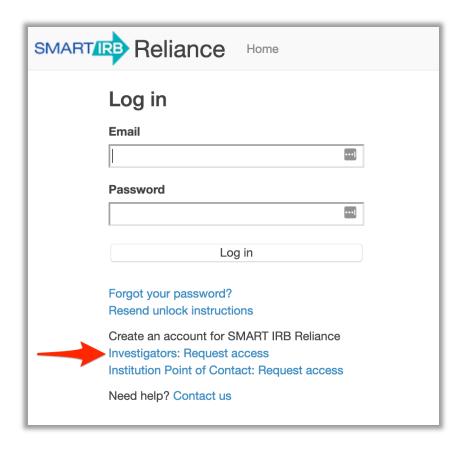
- Any user who will be submitting requests for reliance
- Generally the PI or their designee, such as a study coordinator

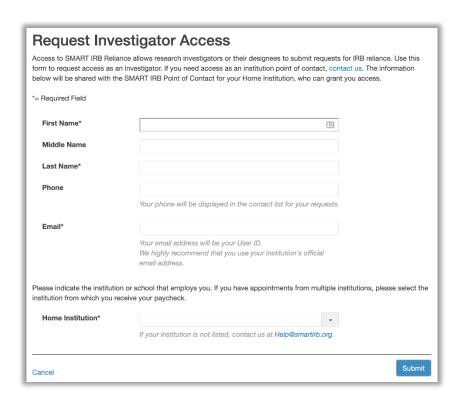
#### Point of Contact (POC)

- Any user who will be making reliance decisions for their institution
- Cannot submit reliance requests
- Generally a member of an institutions IRB office

### **Getting Access**

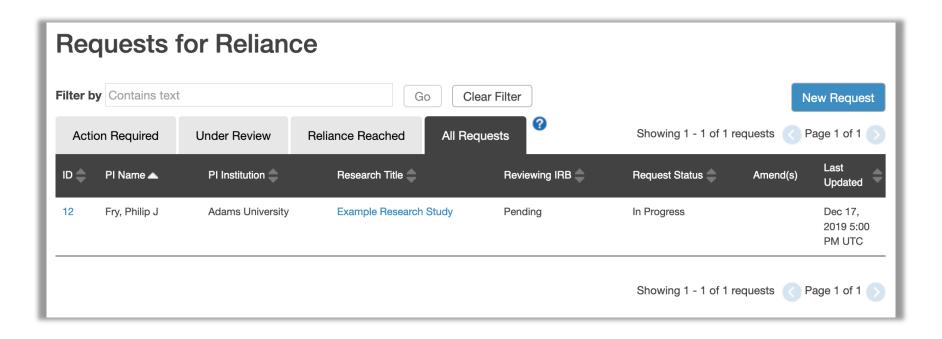
### reliance.smartirb.org

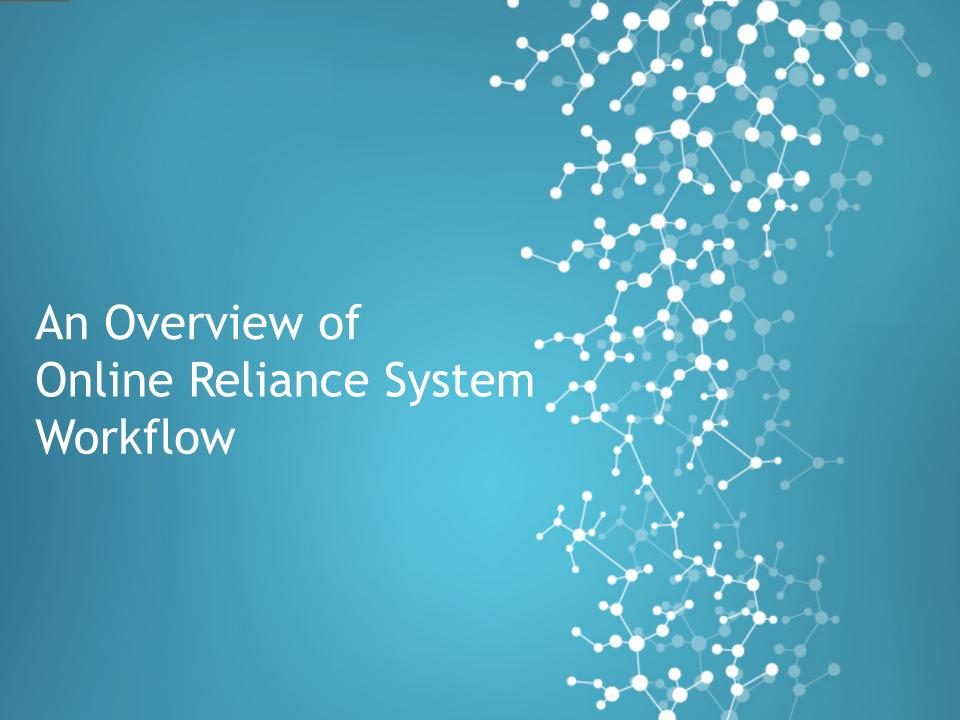




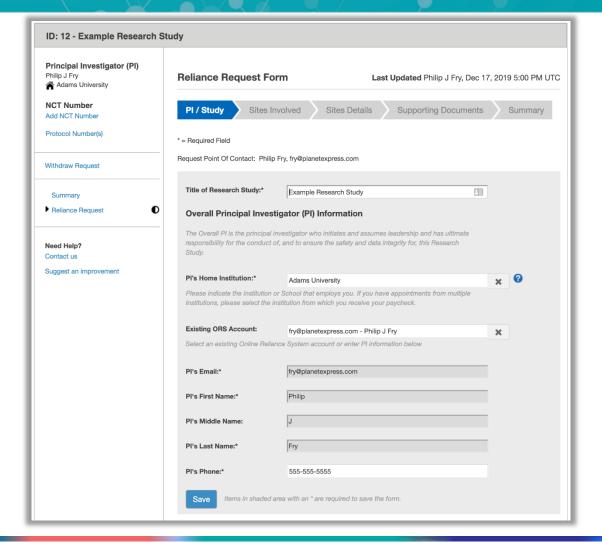
### Reliance System Home Page

- View all of your requests at a glance
- Create a new reliance request

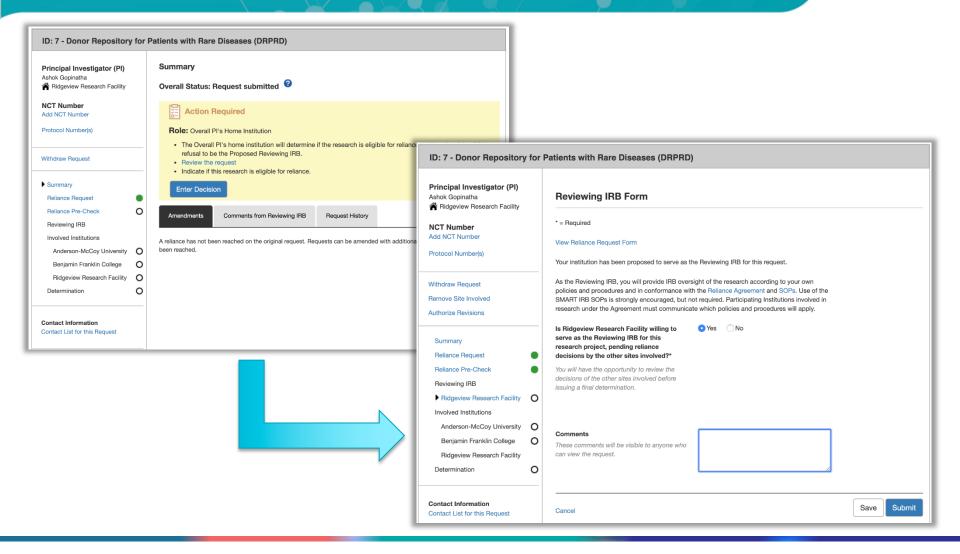




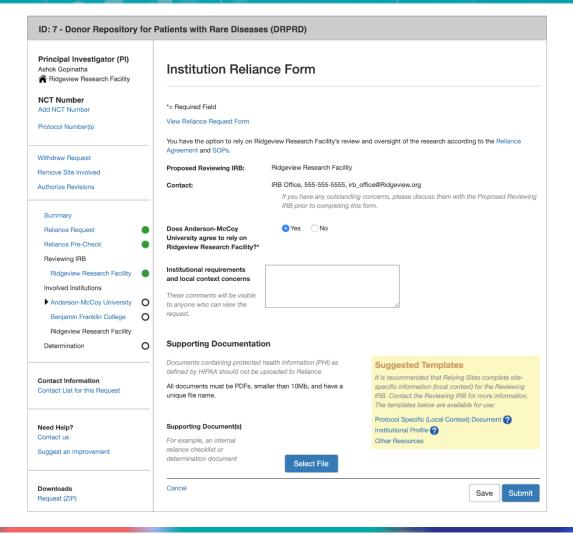
## 1. Create a reliance request



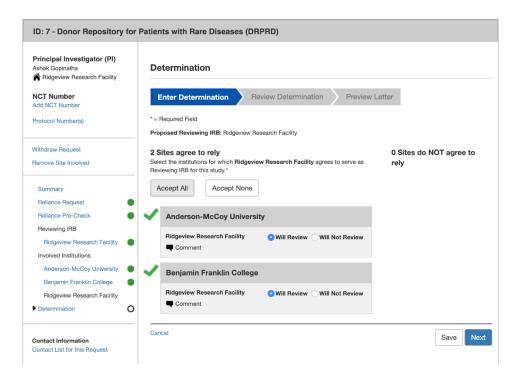
## 2. POC Completes Pre-Check and Reviewing IRB is Identified

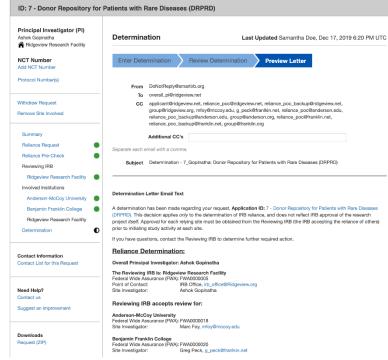


## 3. POCs at the involved sites indicate willingness to rely



## 4. The Reviewing IRB Issues the determination letter





## Online Reliance System Roles



- Initiate ORS Process
- Create Reliance Request
- Can submit amendments
- Reliance Pre-Check
  - Determines eligibility for Reliance
- Confirms their agreement to be the Reviewing IRB
- Determines if site will rely on Reviewing IRB
- Nothing

Getting Help and Additional Resources



## SMART IRB Help Desk

- Since launching the Online Reliance System in May of 2017 we have received over 3500 help requests from users
- In addition to providing a means of directly supporting our users, the help desk provides us with essential feedback about the Online Reliance System.
- We retain the complete details of every ticket we receive enabling us to go back and review and analyze what is working or not working well for our users.
- This feedback from our users has directly led to the development of several key system features.

# Common Help Desk Questions and Solutions

- Error Correction, Remove a Site Involved, and Multiple
   Amendments create a number of ways to deal with issues during the reliance process
  - Error Correction (i.e. reopening a request) for when there is a critical change that needs to be made to request that is in progress.
  - Remove a Site Involved when an institution is no longer participating or is holding up the determination for other site (also addressed through Site Specific Determination Letter)
  - Multiple Amendments for adding sites after the initial reliance agreement is reached

# Common Help Desk Questions and Solutions

- Can't find an institution in the system
  - They either haven't joined SMART IRB or have chosen not to use the ORS
  - You can pursue a reliance with the institutions that are in the system, while making an additional agreement with the missing institution outside of the system

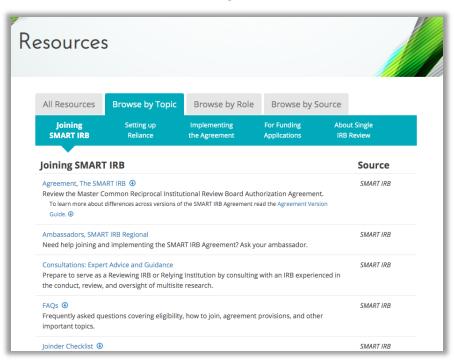
# Common Help Desk Questions and Solutions

- Need access as a "POC"
  - If you need to be able to submit a reliance request, then you should have "investigator" access even if you are not the Principal Investigator.
  - POC access is generally only needed for members of an institution's IRB office

### Additional Resources

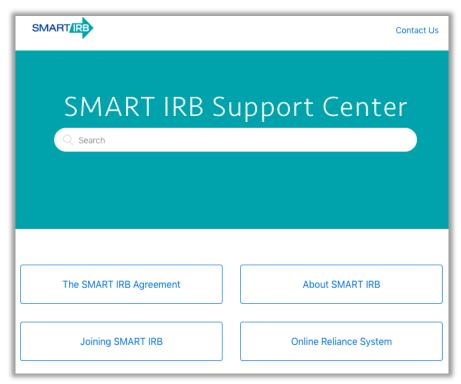
#### Resources Page

smartirb.org/resources



#### **Support Center**

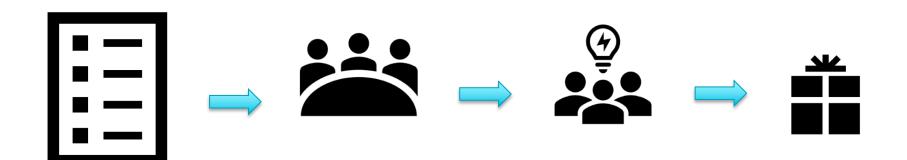
support.smartirb.org



Help is always available at help@smartirb.org

The Development Process





Helpdesk requests ORS Working Group Prioritize list

ORS Working
Group
Regulatory
Consultations
with Kelley
Consultations
with Polly

Development
Team
Technical
Review
Develop scalable
solution
Refine
requirements

Build & QA Communication plan Support Center

### Main Features Released in 2019

#### January 24, 2019 Multiple Amendments

Add/edit multiple sites simultaneously after reliance has reached.

## May 2, 2019 Site Specific Determination letter

Expedites the reliance process. Issue a site specific determination before all Institutions have submitted their Reliance decisions

#### July 25, 2019

Principal & Site Investigators have access to requests they are involved in

Investigators are able to create an account and also see all the requests they are involved in.

#### August 22, 2019

#### Seamless POC registration

A member of an institution can register an ORS account without any interruptions

## September 19, 2019 Social Behavior Research details for

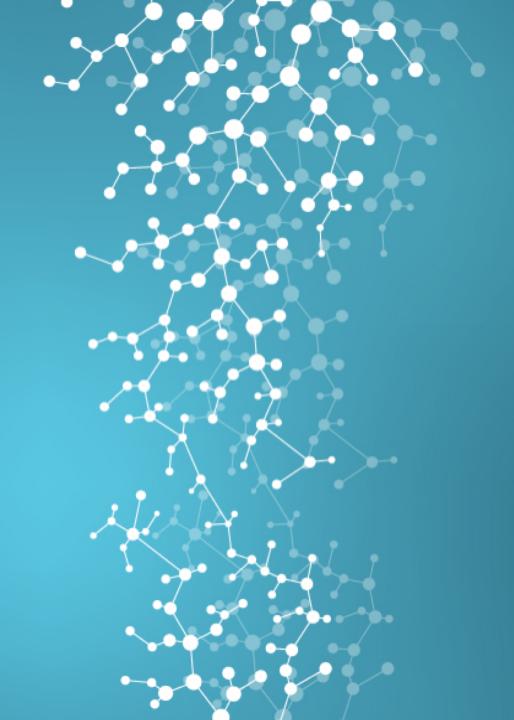
a site

Additional site details for social behavior studies

### Site Specific Determination Letter

- Before all other institutions submit their reliance decisions
- After expressing willingness to rely, Institution POCs can request a site specific determination letter to be issued by the Reviewing IRB
- This is only a site-specific determination letter, a final determination letter for the overall request will be issued once all sites have submitted their reliance form

What is on the roadmap?



### Always improving...

- Ability for POCs to withdraw requests
- Improvements to performance to the Homepage list of requests
  - <1 sec to load page</p>
- Electronic version of the Institution Profile in Joinder
- And more...

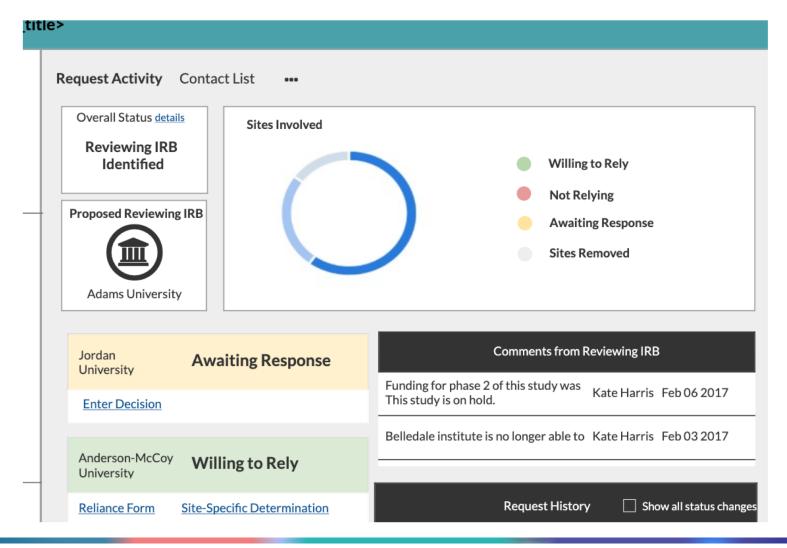
### User Account + Redesign of Password Reset

My Account							
First Name*	Anupama	<b>E</b>					
Middle Name							
Last Name*	Maram						
Phone							
✓ Change password							
You will be logged out after changing your password.							
Current Password*							
New Password*							
Re-type Password*							

### Adding a preview for requests on homepage

	^	287	Belledale Institute	In-depth look at Pediatric Metrics	Pending	Precheck	Oct 3 2017	
П		Overall Status:	Pre-check Completed	No Action Required				
	You have been named on this request with read only access.							
	^	<u>335</u>	Belledale Institute	Advances in Knee Bracing Technology for Prevention of Knee Injuries	Pending	Reliance Reached	Nov 01 2017	
		Overall Status:	Reliance Reached	Finalized Request & Amendment	Determinations			
		You are the submitter of this request.		Determinations have been issued for the following institutions:  Anderson McCoy University, Belledale Institutite				
				<ul> <li>View the <u>Determination Letter</u> for more information.</li> <li>If you need to add a site, fill out the <u>Site Amendment form</u></li> <li>Find Amendment Determinations in the <u>Amendments</u>.</li> <li>If you have any questions, contact IRB Office <u>irb_office@Anderson.org</u>.</li> </ul>				
	~	222	Golden Gate Research Institute	Solving Pain in Rheumatoid Arthritis	Pending	Submitted	Oct 3 2017	
_	^	287	Ridgeview Research Facility	In-depth look at Pediatric Metrics	Ridgeview Research Facility(Proposed)	Reviewing IRB Identified	Oct 3 2017	
		Overall Status: Sites Involved:	Reviewing IRB Identified 1 Willing to Rely	No Action Required				
		1 Awaiting Response		Details ^				
	You are the submitter of this request.			<ul> <li>This request will move to the next step after all Sites Involved have indicated their decision to rely/not rely.</li> <li>Contact the <u>POC of a specific Site</u> with any questions or concerns.</li> <li>To revise this request: email <u>Help@smartirb.org</u> and include the reason(s) for revision. If you would like to revise your reliance decision, coloct your locality in page from the left payingtion many and</li> </ul>				

### Redesigning the Request Summary page



Working with the ORS:
One Institution's Experience



## University of Rochester History w/ SMART

- University of Rochester signed on to the SMART Agreement in October 2016
- Joined the SMART IRB Reliance System Working Group in November 2017
  - Impressed with collaborative environment
  - Evolving with the changing needs of the industry

# University of Rochester Single IRB Research Start Up Process

**ORS/SMART** Reviewing IRB Review Process Reviewing **Relying Site** Reviewing Study Reliance IRB Approval Institutional IRB Approval Conduct for Lead PI Review of Site SMART IRB Protocol and Ancillary Consenting/ **MODEL** consent Committee(s) **Enrolling** Agreement with ORS documents **Approval Subjects** System Institutional • Reliance Review Memo Agreement Local Context • Site-Specific Consent Forms

## University of Rochester Reliance Process/ORS System

### UR Agrees to be the Reviewing IRB

 UR PI must submit a request to the Reliance Coordinator



#### Reliance Relationship

- Push to Use the SMART Agreement and Online Review System OR
- Negotiate Reliance Agreement



#### Reliance Determination

 ORS Determination letter (site-specific)

## University of Rochester IRB Approval Process/Click IRB Review System

## UR PI submits study to UR IRB in Click IRB

 UR IRB reviews protocol documents, MODEL consent, and DRAFT local context survey



#### Study approved by UR IRB

 Reliance Coordinator or UR PI send approved materials to sites



#### Relying Sites -Institutional Review

- Ancillary Review Committee Approvals
- Institutional review memo
- Local context survey
- Create site-specific consent forms based on approved MODEL



Site materials submitted and then approved by UR IRB

### **ORS** Benefits

- Consistency same term agreements
- Transparency all parties see the determinations at all times (Reviewing IRB, Lead PI, Relying IRB)
  - Internal tracking mechanisms, very little visibility

# What the Online Reliance System IS NOT???

- Not an IRB Review System
  - Once Reliance is determined/confirmed, all other transactions happen within the Reviewing IRB and Relying IRB
- Not for Document Management/ Distribution

# University of Rochester Single IRB Research Start Up Process

**ORS/SMART** Reviewing IRB Review Process Reviewing **Relying Site** Reviewing Study Reliance IRB Approval Institutional IRB Approval Conduct for Lead PI Review of Site SMART IRB Protocol and Ancillary Consenting/ **MODEL** consent Committee(s) **Enrolling** Agreement with ORS documents **Approval Subjects** System Institutional • Reliance Review Memo Agreement Local Context • Site-Specific Consent Forms

- Reliance determined one year ago. Four sites (including the lead PI). Consenting and enrolling subjects.
  - Site Investigator at Site #2 retires, he is being replaced with a new Site PI.
  - What do I need to do?

- Reliance determined one year ago. Four sites (including the lead PI). Consenting and enrolling subjects.
  - Site Investigator at Site #2 retires, he is being replaced with a new Site PI.
  - What do I need to do?
- 1) Submit a modification to the Reviewing IRB
- 2) Notify Relying IRB

No need to do anything with SMART ORS, reliance previously determined, documentation will support the change in Site PI

- Reliance determined one year ago. Four sites (including the lead PI). Consenting and enrolling subjects.
  - Enrollment is going slow, need to add another site
  - What do I need to do?

- Reliance determined one year ago. Four sites (including the lead PI). Consenting and enrolling subjects.
  - Enrollment is going slow, need to add a fifth site
  - What do I need to do?
- 1) Determine if 5<sup>th</sup> site is participating Institution in the SMART Reliance Agreement. *Good they are!!!*
- 2) Submit an amendment in SMART ORS to add this new site to your already confirmed determination
- 3) Submit a modification to the Reviewing IRB

# University of Rochester Single IRB - Adding a site in the middle

**ORS/SMART** Reviewing IRB Review Reliance -Relying Site Reviewing **Amendment** Study Institutional IRB Approval Conduct to add site Review of Site in ORS Ancillary Consenting/ Committee(s) **Enrolling Subjects** Approval Institutional Review Memo Local Context • Site-Specific Consent Forms

Join us for the next SMART Talk January 15, 2020 2:00-3:30 pm EST

A Follow-Up Conversation: Getting Ready for the 2020 Single IRB requirements

Register at smartirb.org

Sign up for our mailing list to be notified of future offerings

Questions?
Contact help@smartirb.org

## **Questions and Discussion**