



# Single IRB Boot Camp: A How-to Guide with SMART IRB

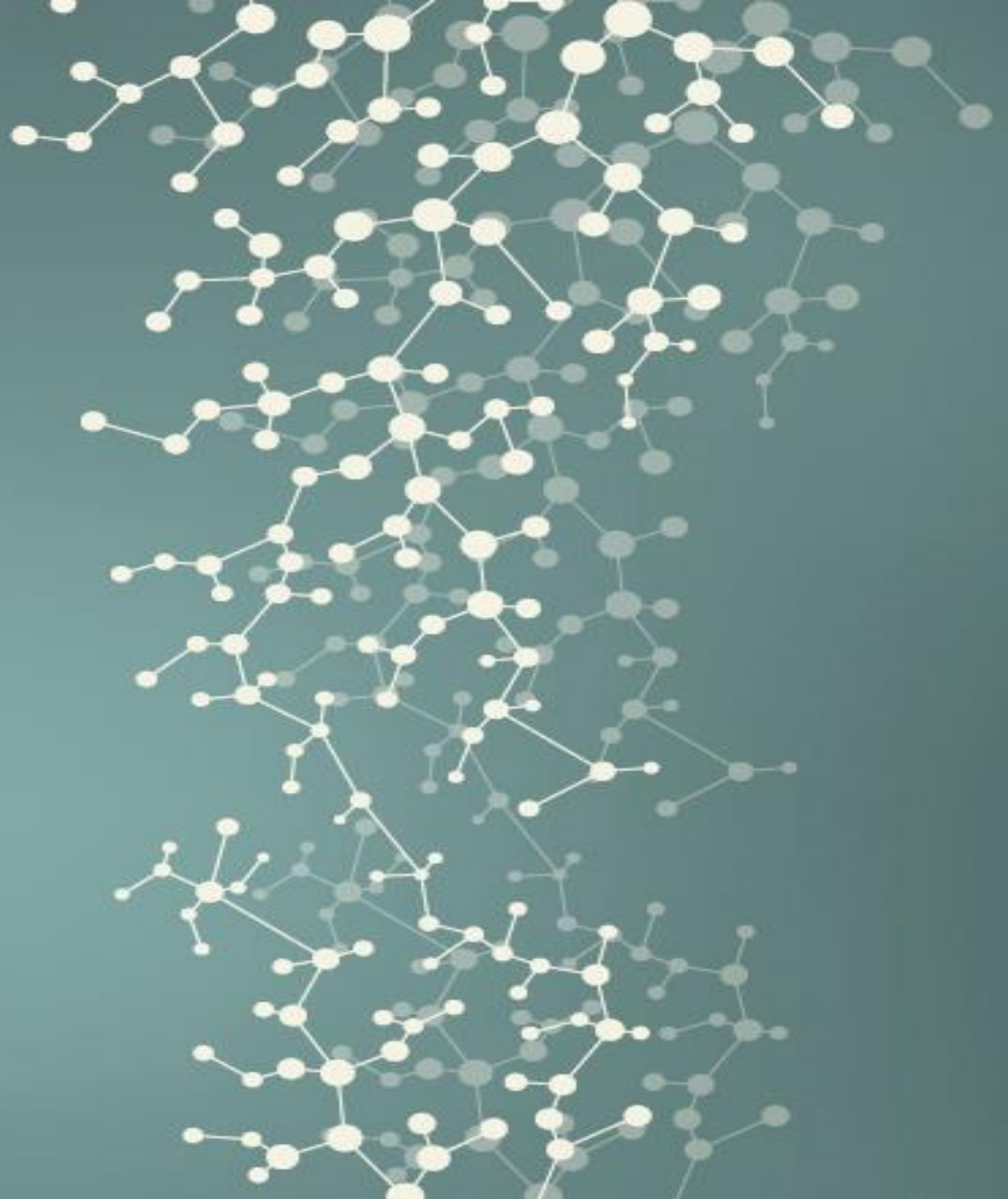
## Day 2 - October 30, 2025

This project has been funded in whole or in part with Federal funds from the National Center for Advancing Translational Sciences, National Institutes of Health, Department of Health and Human Services, under Contract No. 75N950C00008.

**Michael Linke, PhD**

Program Director, Education, SMART IRB

# Welcome and Overview



# Welcome!

## **You will gain a better understanding of:**

- The single IRB (sIRB) review model and its impacts on IRBs/HRPPs, institutions, and investigators
- The SMART IRB platform and how it supports the implementation of sIRB review across the nation
- What HRPPs need in place for single IRB review
- Training and Preparing Study Teams for sIRB Review
- How and when to leverage SMART IRB resources & tools

# Logistics

The presentations will be recorded and posted on the SMART IRB Website along with the slides

If you have technical difficulties, please reach out through the chat for help.

If you have any questions for the panelists, please use the chat or Q&A function to submit them.

Please provide feedback by completing the survey  
- a link will be posted in chat and emailed.



# Day 2 Overview

Time	Presentation Topic	Presenter
12:00 - 12:05 pm	Welcome	Mike Linke
12:05 - 1:05 pm	Communication	Ada Sue Selwitz Stacey Goretzka
1:05 - 1:50 pm	Training Study Teams	Nichelle Cobb Mike Linke
1:50 - 2:00 pm	Break	
2:00 - 2:25 pm	Harmonization Guidance Review	Nichelle Cobb
2:25 - 2:55 pm	Resources Recap and Frequently Asked Questions	Polly Goodman Jeremy Lavigne
2:55 - 3:00pm	Final Questions & Wrap Up	Mike Linke

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Onward!



# Smart IRB Bootcamp

## Single IRB: Communication!!!

## Communication!!! Communication!!!

### Presenters

Stacey C. Goretzka, CIP  
Independent Consultant  
Smart IRB Ambassador

Ada Sue Selwitz, MA  
Executive Integrity/Compliance  
Advisor, University of Kentucky  
Smart IRB Ambassador

# Acknowledgements

- Nichelle Cobb, Association for the Accreditation of Human Research Protection Programs
- John Heldens, University of Colorado-Denver
- Jennifer Hill, University of Kentucky
- Carissa Minder, Washington University-St. Louis

# What we will discuss this session

- Who are the key players in a Single IRB Communication Plan?
- What are examples of Communication Models? (Flow of communication)
- Who communicates what? (Responsibilities)
- What to do when there are disagreements or miscommunications? (Challenge)

# Key Players\*

- Lead Institution
- Reviewing IRB
- Lead/Overall PI
- Relying PI/Study Team
- Relying Institution



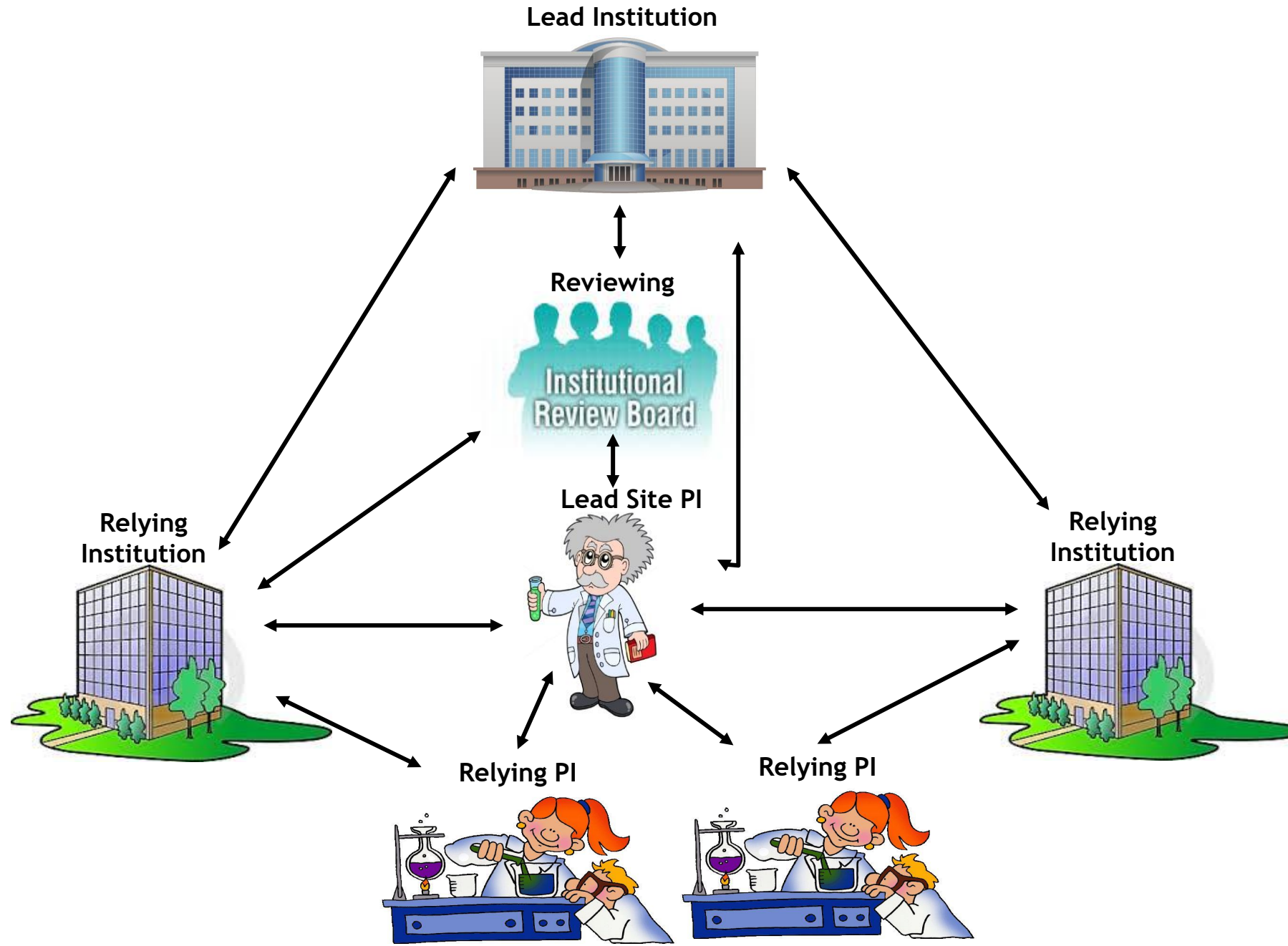
\*Other players: Funding/Regulatory Agency or Coordinating Center, etc.

# Two Popular Communication Models

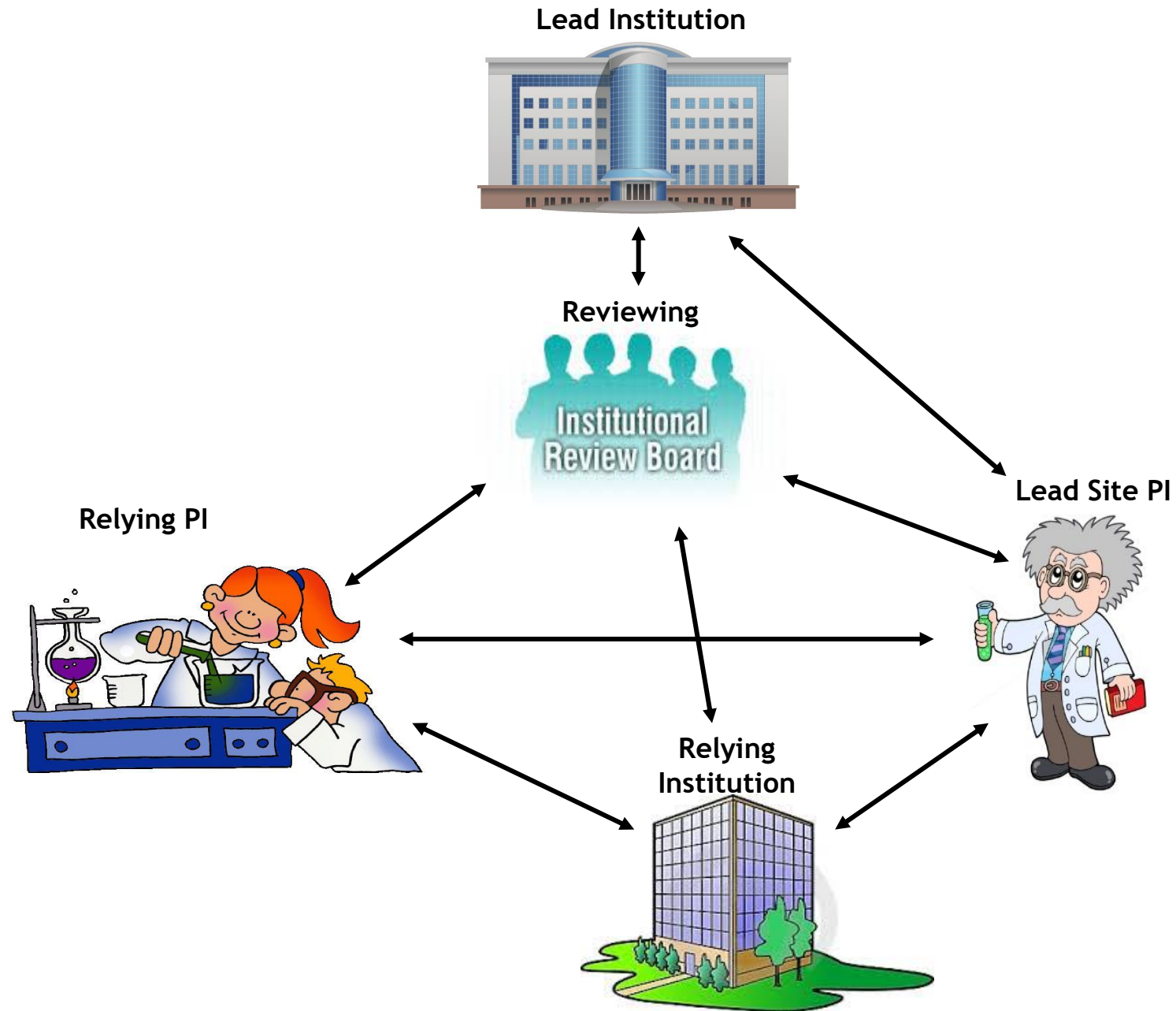
- Lead PI Communication Model: Study team information flows to the Reviewing IRB through the Lead/Overall PI; Relying PIs send information to Lead PI
- Relying PI Communication Model: Relying PIs work directly with Reviewing IRB and copy Lead/Overall PI
- Smart IRB Agreement allows either model, or a variety of other models, but the Smart IRB Resource documents are usually based on the Lead PI Communication Model



# Lead PI Model



# Relying PI Model



Hint: Critical that you know what type of communication model will be used



- Challenge: The agreement may not specify type of flow. What do you do in that case?
- Challenge: The Reviewing IRB may not communicate their expectations for communication! What do you do in that case?

# What do you do?

- If Relying (Institution or PI), ask the Reviewing IRB!
- If Reviewing IRB, work it out!
  - Have a mechanism in place
  - Be clear on expectations and communication flow
  - Be flexible
- To assist in developing communication plan, use Smart IRB Resources (e.g., Implementation Plan, Template Communication Plan, Overall and Relying Site PI Checklists, Protocol-specific Document)

## Hint: Who communicates what? (Responsibilities)



- The basic communication responsibilities for Single IRB are very similar to standard IRB practices.
- However, which Key Player is responsible depends upon the Communication Model being used, Reviewing IRB requirements, the specific protocol procedures, institution policies/procedures, and institutional resources.

# REVIEWING IRB Communication Responsibilities: Provide to Lead PI, Relying Institution and Relying PI



- Reviewing IRB policies and Procedures
- Communication Plan (identifying flow of communication)
- Implementation Plan (confirming who does what and use of default implementation in the agreement vs flexible implementation)
- Request for Local Considerations Information (e.g., applicable state or local laws, institutional policies, local factors)
- Request for Select Ancillary Reviews such as Conflict of Interest Management Plan
- Approved Consent Template including site-specific information/identified in customizable sections of the consent form such as compensation for research related injury, payment of research costs, local contact information
- Request documentation or Assurances for research personnel education, training, & qualifications
- IRB Determinations, Review Decisions for all types of review (initial, continuing, amendment etc.), Lapses of Approval and Applicable Corrective Action Plans
- IRB Findings and Actions related to reportable issues (e.g., unanticipated problems, serious or continuing noncompliance, suspension or termination, significant subject complaints, subject injuries, unanticipated problems involving risks to subjects or others, reports to federal, state or funding agencies)





- To Local Relying PI/Study Team
  - Relying Institution policies and procedures regarding use of an external IRB and the relying institution's expectations for communication with them and with the reviewing IRB
- To Reviewing IRB promptly respond to requests for the following:
  - Local Considerations Information such as state and local laws and regulations, institutional policies, local factors
  - Consent Form with customized site-specific information addressed
  - Request for Ancillary Review information such as Conflict of Interest Management Plan
  - Documentation or Assurances for research personnel education, training, & qualifications
  - Ensures the Relying Study Team notifies the Reviewing IRB of unanticipated problems, potential noncompliance, suspension or restriction, significant subject complaints



# LEAD/OVERALL PI & STUDY TEAM

## Communication Responsibilities for the Lead PI Communication Model



- Contact their local Human Research Protection Program to identify local policies for single IRB
  - Provide home institution information required by its policies and procedures (including back and forth communication regarding selection of reviewing IRB)
- Communicate with Reviewing IRB to determine and document specific roles and responsibilities for communicating and coordinating key information to Relying Institutions & Relying PIs
  - Develop plan for communicating with Relying PIs and with the Reviewing IRB across lifetime of study (e.g., regular conference calls, site initiation procedures, training materials, etc.)

# LEAD/OVERALL PI & STUDY TEAM

## Communication Responsibilities for the Lead PI Communication Model (Cont.)



- Promptly respond to questions from Relying PI teams and Relying Institution HRPP staff
- Provides Relying Study Team with Reviewing IRB policies and procedures and the IRB determinations/actions for life of protocol (e.g., IRB approved versions of all study documents consent, authorization forms, protocol, recruitment, amendments, reports on unanticipated problems, serious or continuing noncompliance, subject complaints)
- Provides the Reviewing IRB with all required submissions (e.g., initial review, local considerations, information for each site, local amendments, personnel updates, local reportable events, study wide information for continuing review and amendments)
  - Lead Study team should have mechanism for obtaining and collating information from Participation Site and/or Relying Site POC

# RELYING PI & STUDY TEAM Communication Responsibilities for the Lead PI Communication Model



- Contact their local Human Research Protection Program (HRPP) to identify local policies for single IRB
  - Provide home institution information required by its policies and procedures (including back and forth communication regarding selection of Reviewing IRB and requirements during life of study)
- Provide management plans for relevant HRPP personnel
- Collaborate with local HRPP personnel in identifying local context issues specific to the protocol and incorporate local required language into the consent template

# RELYING PI & STUDY TEAM Communication Responsibilities for the Lead PI Communication Model (Cont.)



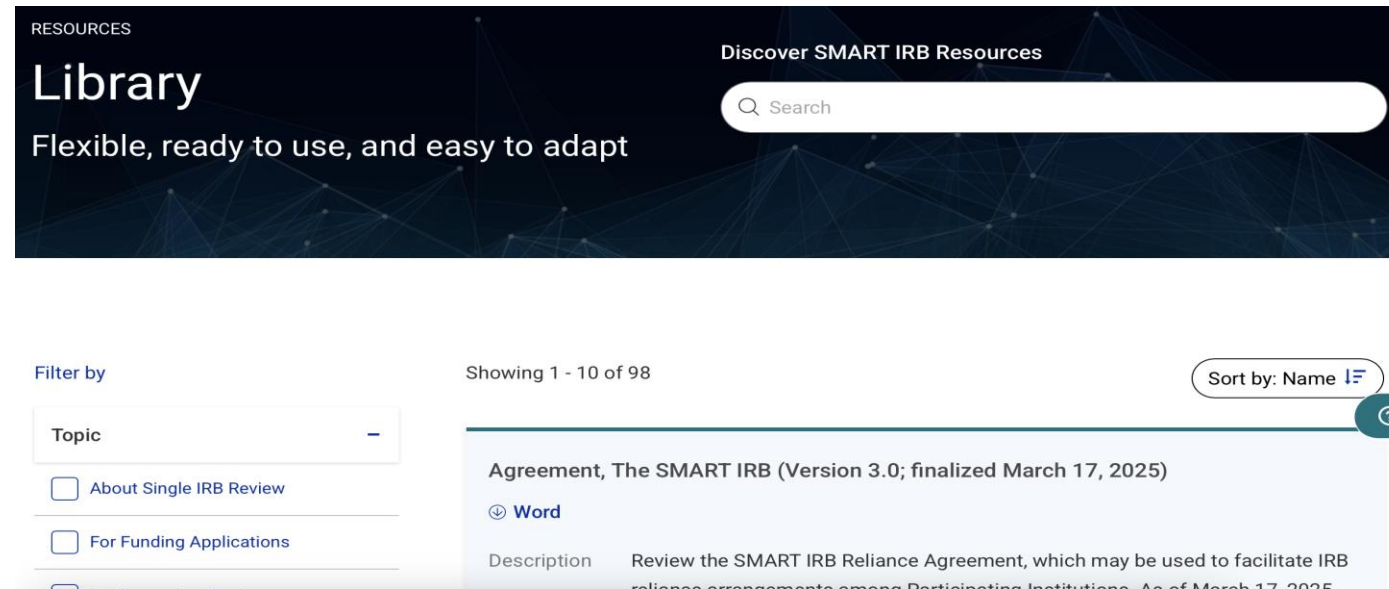
- Provide local reviews and signoffs such as coverage analysis, department approvals, data use agreements, material transfer agreement, ancillary committee reviews
- Promptly respond to questions from Lead/Overall PI Study Team and local Relying HRPP\* personnel
- Provide Lead/Overall PI Study Team with all required submissions (e.g., local considerations, initial review, personnel updates, local reportable events, subject complaints, site continuing review request, etc. and any other issues required by Lead PI who will be forwarding on to the Reviewing IRB.)

# Smart IRB Resources for Lead/Overall PI & Relying PI and Study Team

- Relying Site Investigator Guidance and Checklist  
<https://smartirb.org/wp-content/uploads/Relying-Investigator-Guidance-and-Checklist.pdf>
- Potential Relying Site Study Team Survey document  
<https://smartirb.org/wp-content/uploads/Relying-Site-Team-Survey.pdf>

# Smart IRB Resources for all Key Players

- <https://smartirb.org/resources/#/>



- Implementation Checklist
- Template Communication Plan





**Purpose of Form:** This form documents the terms by which participating institutions will follow for the identified research. This form is intended to be validated by Reviewing IRB POC and Relying Institution POCs.

## Implementation Checklist and Documentation Tool

Reviewing IRB Institution	
Relying Institution	
Research Study Title(s):	
Reviewing Institution PI	
Relying Institution Site Investigator	
SMART IRB Agreement Terms	<input type="checkbox"/> Default Implementation Applies <input type="checkbox"/> Flexible Implementation Applies (as outlined below)
<b>This Implementation Checklist was completed by the following institutional representatives (Name, Role, Date):</b>	
Reviewing Institution POC/Designee	
Relying Institution POC/Designee	

### Reviewing IRB

#### 1. Notification of Acceptance or Declination of Ceded Review

- ☐ **(DEFAULT) OPTION 1 – Reviewing IRB Will Provide Notification**  
The Reviewing IRB will notify the Overall PI (or designee), the Site Investigator(s), and involved Participating Institution(s) whether the identified research is accepted for Ceded Review and, if accepted, the designation of the Reviewing IRB and





**Purpose of the form:** This form should be used to document key communication roles/responsibilities for specific studies. Reviewing IRB/HRPPs may use this form to document general expectations of study teams and relying site IRB/HRPPs, or less formally to guide conversations among the Reviewing IRB, Relying Institutions, and Lead Study Team. The SMART IRB recommends this form be kept up to date with all key information throughout the life of a study.

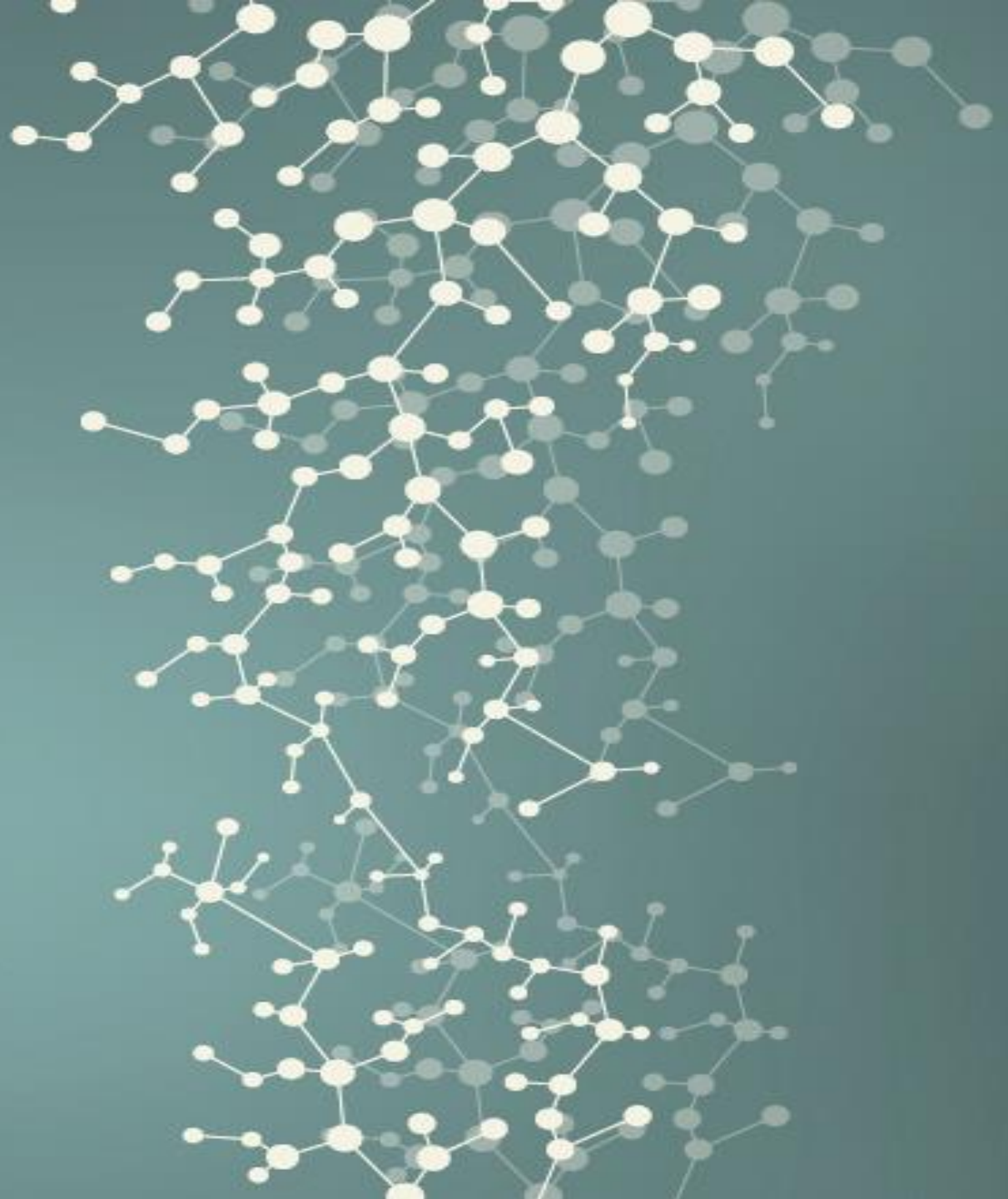
## Communication Plan Template

### Definitions:

- + **REVIEWING IRB – Point of Contact (POC):** Main person responsible for addressing questions related to the Reviewing IRB's policies and procedures and review status for a ceded study
- + **LEAD STUDY TEAM – Representative:** Main person responsible for communication with the Reviewing IRB and facilitating communication between relying site study teams and the Reviewing IRB regarding the ceded study
- + **RELYING SITE – POC:** Main person responsible for communication with the Reviewing IRB and local study team regarding the ceded study (e.g., personnel in the local IRB office or local human research protection program personnel)
- + **RELYING SITE STUDY TEAM – Representative:** Main person responsible for communication with the Lead Study Team regarding the ceded study

AREA OF COMMUNICATION RESPONSIBILITY	RESPONSIBLE PARTY (*TYPICAL PARTY IDENTIFIED)		NOTES
<b>Conflict of Interest:</b> Providing applicable Relying Site Conflict of Interest management plans to the Reviewing IRB	<input type="checkbox"/> Relying Site Study Team  <input type="checkbox"/> Lead Study Team*	<input type="checkbox"/> Relying Site POC  <input type="checkbox"/> Other, specify:	
<b>Study Team Training &amp; Qualifications:</b> Providing confirmation to the Reviewing IRB that relying site study teams have completed relevant training and are qualified to conduct the proposed research	<input type="checkbox"/> Relying Site Study Team  <input type="checkbox"/> Lead Study Team*	<input type="checkbox"/> Relying Site POC  <input type="checkbox"/> Other, specify:	
<b>Local Considerations:</b> Collecting local information related to Relying Institution's local and state laws; federalwide assurance applicability (e.g. "checking the box"); institutional requirements; unique cultural, language, geography, or socioeconomic factors; or standard of care	<input type="checkbox"/> Relying Site Study Team*  <input type="checkbox"/> Lead Study Team	<input type="checkbox"/> Relying Site POC*  <input type="checkbox"/> Other, specify:	
<b>Local Considerations:</b> Providing completed local context information to the	<input type="checkbox"/> Relying Site Study Team	<input type="checkbox"/> Relying Site POC	

# Example Communicating Conflict of Interest



Determine who will perform the conflict of interest analysis

Relying Institution?



Reviewing IRB?



# Implementation Checklist

## 5. Conflict of Interest *Sections 5.8 and 6.6*

### ☐ **(DEFAULT) OPTION 1 – Relying Institution Will Perform Conflict of Interest Analyses of their Research Personnel Under Their Policies**

The Relying Institution will perform their own analyses under their relevant policy(ies) with respect to disclosure and management of their Research Personnel's conflicts of interest in connection with the identified research. The Relying Institution's resulting determinations, prohibitions, management plans, and any updates will be provided to the Reviewing IRB. Note that the Reviewing IRB has the right to impose additional prohibitions or conflict management requirements.

### ☐ **OPTION 2 – Reviewing IRB will Perform Conflict of Interest Analyses of the Relying Institution's(s') Research Personnel Under Its Policies**

The Reviewing IRB will apply its institution's own policies with respect to disclosure and management of the Relying Institution's(s') Research Personnel's conflicts of interest in connection with the identified research. The Reviewing IRB will notify the Relying Institution(s) of the IRB's resulting determinations, prohibitions, management plans, and any changes thereto. Note that the Relying Institution(s) may propose additional prohibitions or conflict management requirements to the Reviewing IRB for approval.

### ☐ **OPTION 3 – Relying Institution and Reviewing IRB have Agreed on an Alternate Plan for Conflict of Interest Analyses**

[DESCRIBE ALTERNATE PLAN]



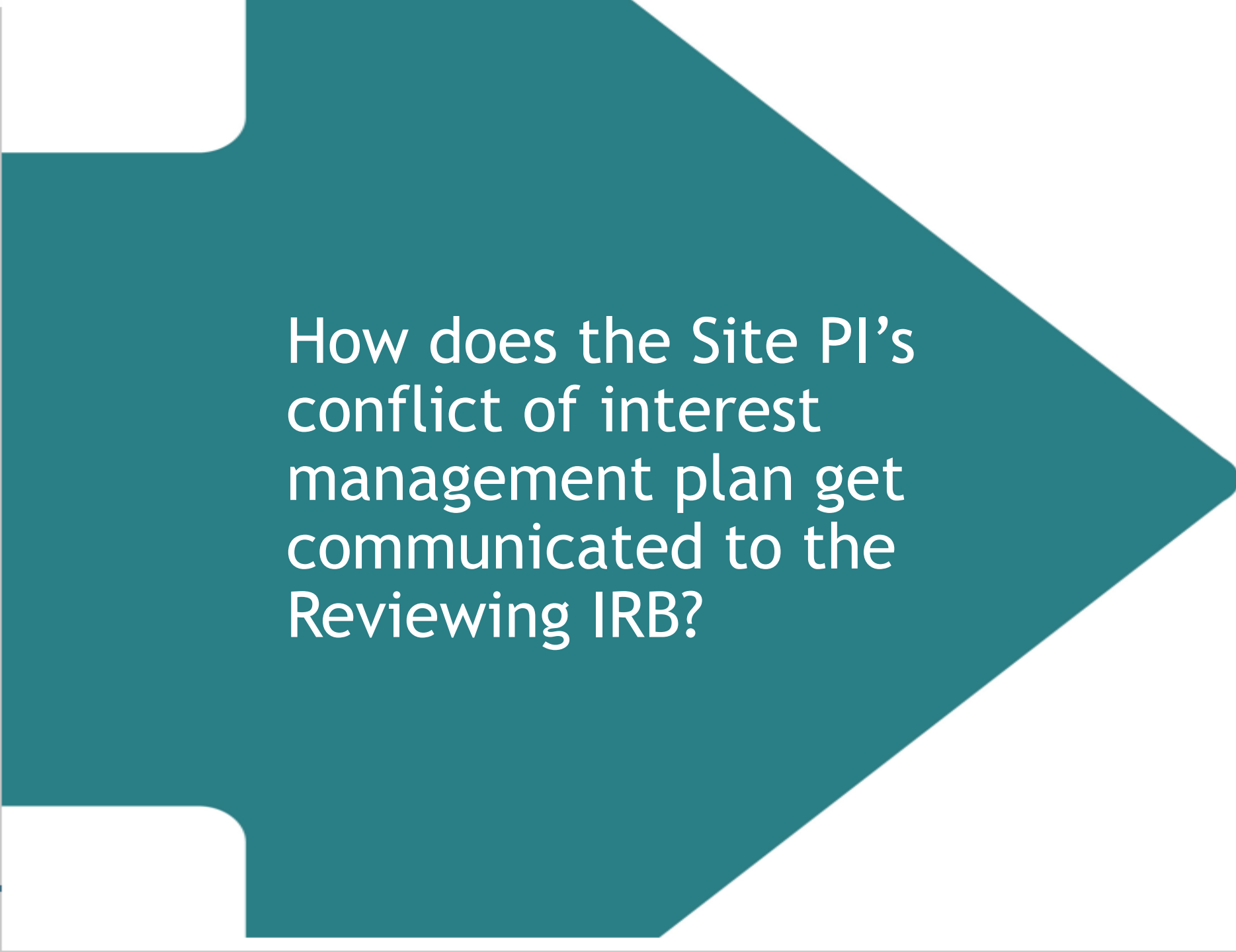
# Communication Plan

AREA OF COMMUNICATION RESPONSIBILITY	RESPONSIBLE PARTY (*TYPICAL PARTY IDENTIFIED)	NOTES
<b>Conflict of Interest:</b> Providing applicable Relying Site Conflict of Interest management plans to the Reviewing IRB	<div><input type="checkbox"/> Relying Site Study Team</div> <div><input type="checkbox"/> Lead Study Team*</div> <div><input type="checkbox"/> Relying Site POC</div> <div><input type="checkbox"/> Other, specify:</div>	



- The relying institution communicates their COI process to the relying site PI.
- The relying institution performs the COI analysis under their policies.
- The relying institution communicates the COI management plan to the relying site PI.



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How does the Site PI's  
conflict of interest  
management plan get  
communicated to the  
Reviewing IRB?



- The reviewing IRB communicates the process to receive information about COI and associated management plans from relying institutions.
- Examples of how reviewing IRBs collecting this information from relying sites might include the use of:
  - Local Context/Considerations Forms
  - SMART IRB Protocol-Specific Document

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## PROTOCOL-SPECIFIC DOCUMENT

*To Collect Institutional Requirements from Relying Institutions*

### Resource

<https://smartirb.org/wp-content/uploads/Protocol-Specific-20180726.pdf>

17. Did the organization determine there is a relevant individual or institutional financial **conflicts of interest (COI)** *i* for this protocol?

- ☐ No
- ☐ Yes and the COI has been eliminated
- ☐ Yes and a management plan has been developed
- ☐ N/A organization does not have a COI review process *i*

a. If yes, provide summary of conflict and management plan, or attach documentation. *i*

b. If yes, provide the name and contact information for the appropriate POC for questions related to the determination and/or local management plan. *i*

# Lead PI Responsibilities for Conflict of Interest

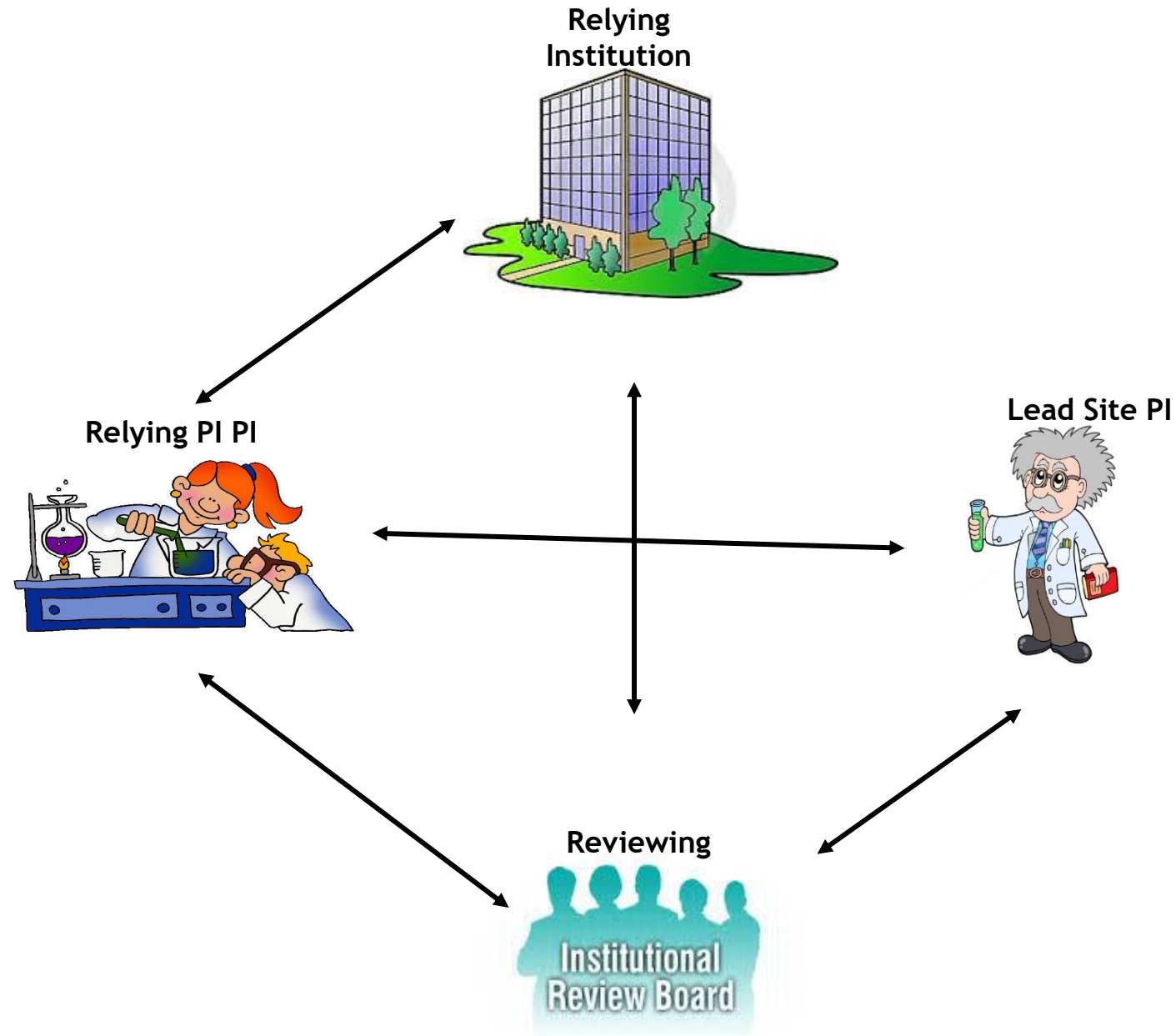


- Using the example of the Lead PI Communication Model, the Lead PI:
  - Communication to the relying sites how the reviewing IRB will receive information regarding COI.
  - Communicates COI information from relying sites to the reviewing IRB.



- Reviews conflict of interest management plan from relying institution.
- If additional changes or strategies are needed, reviewing IRB communicates according to original plan established for communication.
  - *Note! In the earlier example using the “Protocol Specific Document” to collect COI information, there is a designated area to provide the contact information for POC at the relying institution.*

# Conflict of Interest - Lead PI Model






# Smart IRB Resources

- SMART IRB Harmonization Document
  - Conflict of Interest Review Process for sIRB Review

# <https://smartirb.org/harmonization/>

Reliance Agreement ▾Reliance System ▾HarmonizationResources & Education ▾Support ▾

Guidance, Tools & Templates

For Review and Comment

Steering Committee

How We Work

**Recommendations for the Harmonization of Ancillary Reviews**

Best practices for defining ancillary reviews and recommendations for centralizing reviews, timing, and allocating responsibilities in an sIRB context. Includes guidance and an implementation checklist.

⬇ Zip File

**Conflict of Interest Review Processes**

Addresses responsibilities of a Relying Institution and a Reviewing IRB/Reviewing IRB Institution in the COI review process, including FAQs and guidance for determining and managing COI.

⬇ PDF

**Post-Approval Auditing**

Identifies best practices and provides tools to support for-cause and not-for-cause audits in an sIRB context. Includes guidance, checklists, and a template report.

⬇ Zip File

?

# Communicate Early and Often!



**Things should be  
very clear from  
the beginning and  
through the life of  
the study**



**Use and understand the agreement  
Use the implementation checklist  
Use the template communication plan  
Use the protocol-specific document**



What do you do when there are disagreements  
or miscommunications?

Communication Tips

# Communication Breakdown - A Case Example

- Early in the process the Reviewing IRB & Relying Institution agrees to pursue reliance
- Time goes by ...
- The Reviewing IRB inquires with the Lead PI if he has heard anything
- Lead PI contacts the Relying PI
- Relying PI produces a letter from 6 months prior from the Relying Institution indicating they have agreed to rely
- Nothing was documented between the Reviewing IRB and Relying Institution

# He said / She Said - A Case Example

- Reviewing IRB sends out a template consent form with sections marked for site specific language.
- Relying Site Investigator sends back to the Reviewing IRB a consent form with lots and lots of changes and says her IRB requires all this.

But the local context form submitted from the Relying Institution doesn't mention it.....

What should the Reviewing IRB do?

# He said / She said - A Case Example

## What should Reviewing IRB do?

- Assume the PI is right?
  - Be confused?
  - Get mad?
  - Waste time wondering?
  - Read their minds?
- Send an email or call the Relying Institution/IRB and ask?
  - Be Calm
  - Be Flexible
  - Solve it!



# Reviewing IRB Position

- Reach Out!
  - Get to the root of the issue
  - Don't assume
- Be Flexible!
  - Can you accept something different?
- Be Nice!
  - It's a small world
- Start and end on a positive note

# Relying Institution Position

- Ask questions/clarification or ask for options!
  - Can you provide the information another way?
  - Do we have to do reliance?
- Roll with it!
  - Sometimes, you just have to get through
- Be Nice!
  - It's still a small world
- Start and end on a positive note

# Pro Tips on Communication

Be Willing to Talk and Listen

To other IRBs, to PIs, to anyone.

Don't be Shy

Ask, Be responsive, Keep it short

## Pro Tips on Communication (continued)

### Assume Good Intentions

It's for you, not for the other person

Assume a friendly tone in emails, calls, etc.

### Ask yourself, does this matter?

Do you want to be right or do you want to be done?

Stay flexible

# Gratitude

- If you have a positive interaction with another IRB, a relying PI, anyone, let them know
- If you have a PI/Study Team that is really on top of sIRB procedures, share your appreciation
- If your IRB Chair and members have a terrific handle on sIRB, say thank you

## In summary, what did we discuss today?

- Who are the key players in a Single IRB Communication Plan?
- What are examples of Communication Models? (Flow of Communication)
- Who communicates what? (Responsibilities)
- What to do when there are disagreements or miscommunications? (Challenge)

# Reminder: Communicate Early and Often!



**Things should be  
very clear from  
the beginning and  
through the life of  
the study**



**Use and understand the agreement  
Use the implementation checklist  
Use the template communication plan  
Use the protocol-specific document**





# Training Study Teams

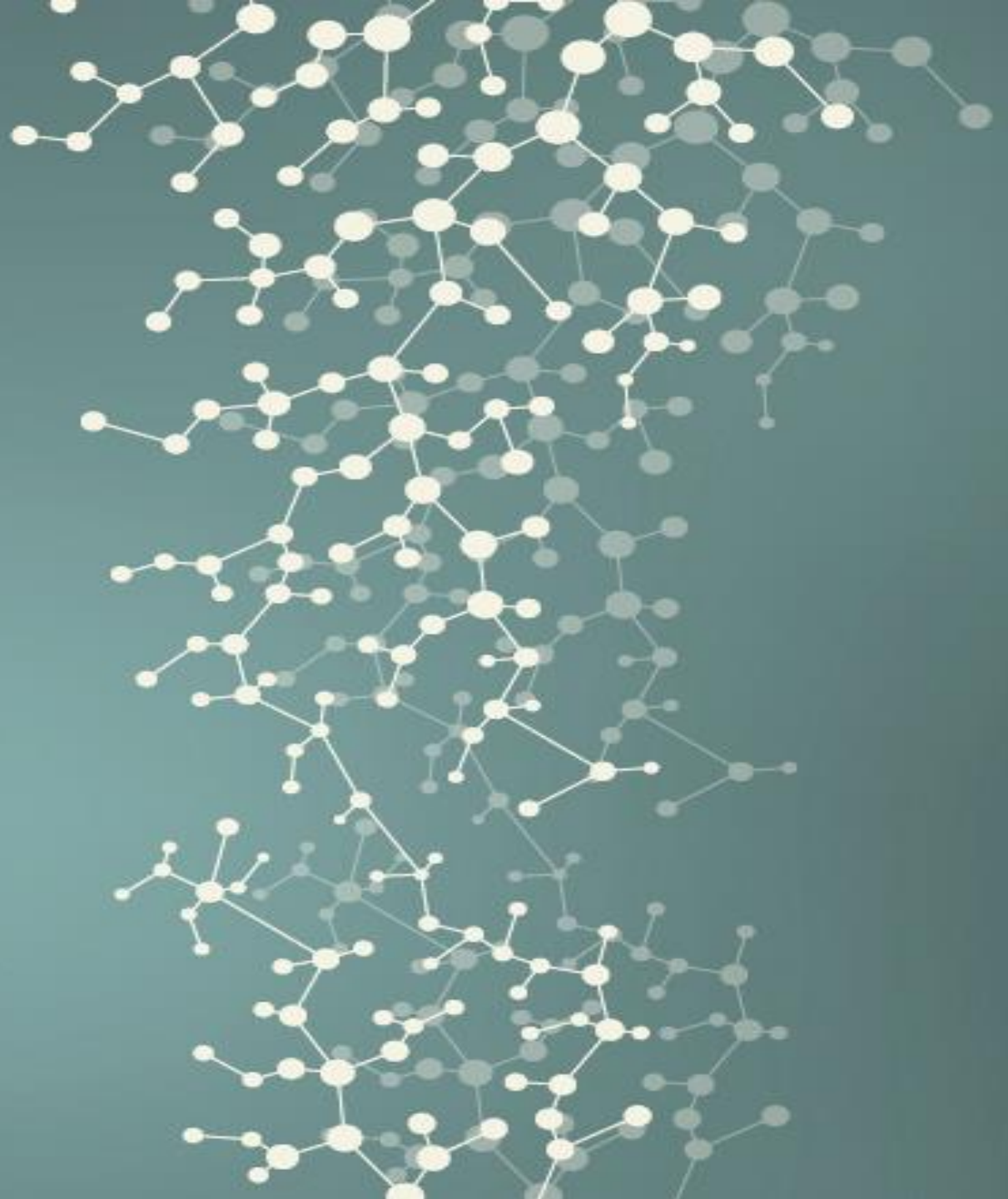
**Nichelle Cobb**, Senior Advisor for SMART IRB; Senior Advisor for Strategic Initiatives, Association for the Accreditation of Human Research Protection Programs (AAHRPP)

**Mike Linke**, SMART IRB Program Director for Education and Training; Chair, University of Cincinnati IRB and StrokeNet Central IRB; Adjunct Professor of Internal Medicine, University of Cincinnati

# What We Will Cover

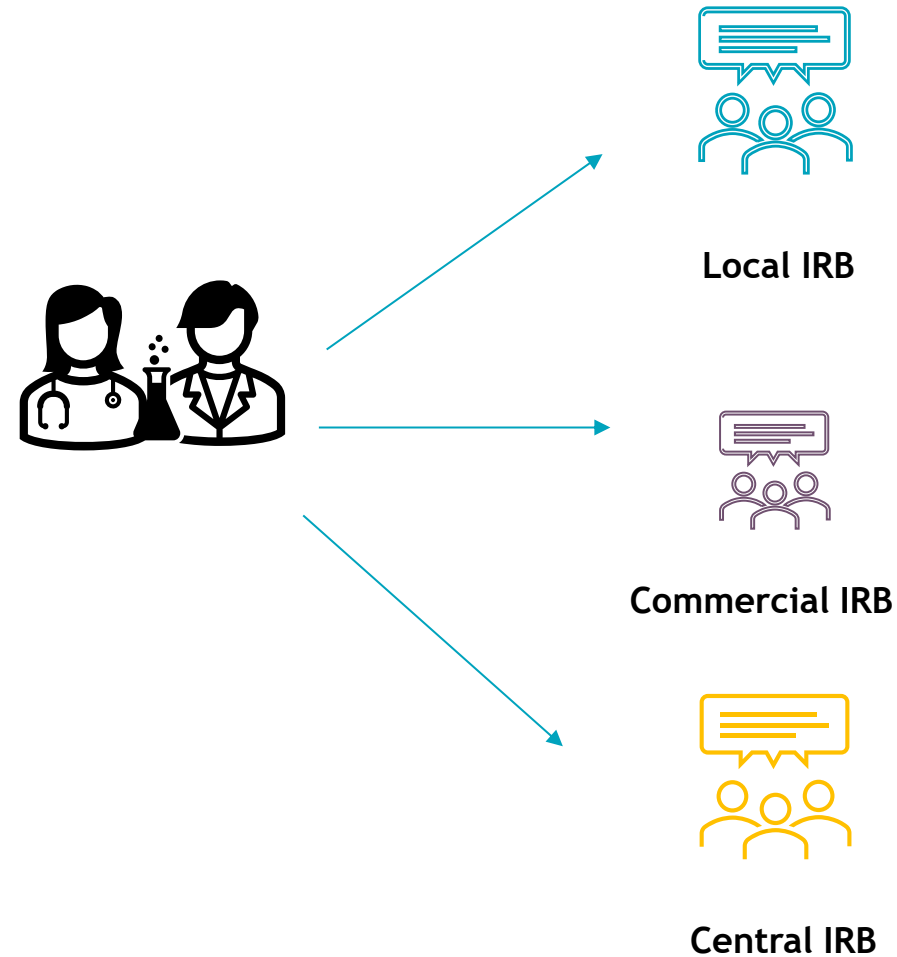
- Overview the effect of single IRB on study teams and impact on training needs
- SMART IRB resources that can be leveraged to train study teams
- Strategies for study team training and education

Study teams need to know  
what is different about  
single IRB compared to  
when they use their  
internal IRBs



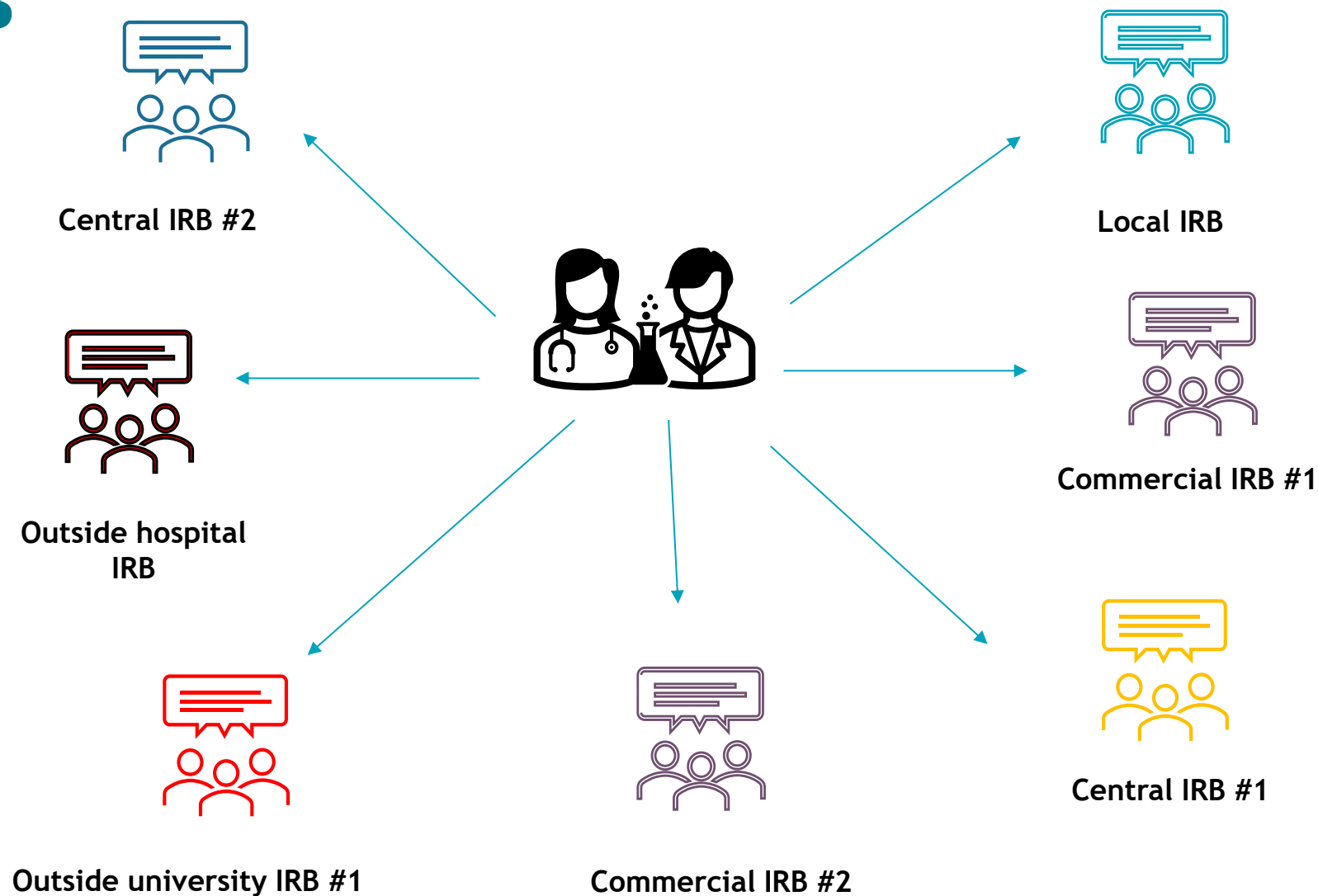
# Before Single IRB

Researchers usually worked with their home institution IRBs and sometimes an independent IRB (aka commercial IRB) for industry-sponsored research and perhaps a disease-focused central IRB (e.g., the NCI Central IRB or StrokeNet IRB)



# After Single IRB

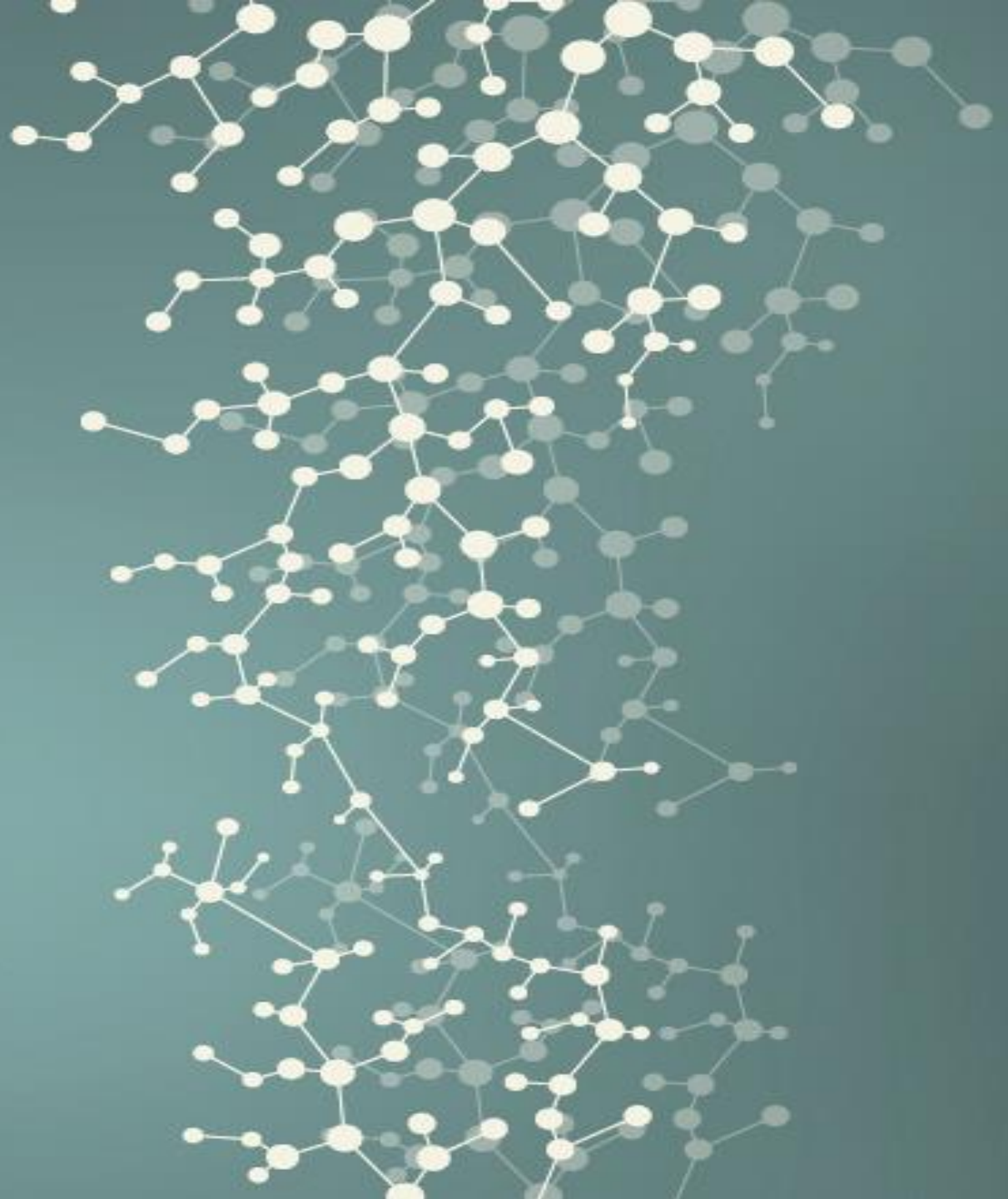
Researchers  
are working  
with so many  
more IRBs



# Key Differences for Research Teams

- Budgeting for single IRB
- When they need to talk to their local IRB/HRPP office
- Additional steps for obtaining IRB approval
- Variations in forms, processes, and policies across IRBs both for setting up reliance agreements and IRB review
- Providing local context information
- Additional responsibilities, especially if they are the Lead Study Team
- What they need to report to their institution when they use an external IRB

# Grants and Budgets





# Budgeting for Single IRB Review

## IRB Fees

NIH Single IRB Policy now permits institutions to charge for some components of IRB review when the institution either acts as the Reviewing IRB for the study or contracts with an independent (aka commercial) IRB to serve as Reviewing IRB.

## New Staff Roles

May need to add staff who can manage communication between IRB and study teams across participating sites, especially when serving as a Lead Study Team

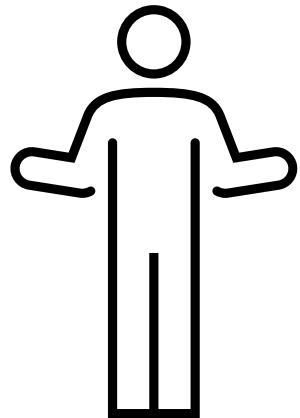
## New Resources

May need new platforms to disseminate documents to study teams

# Federal Grants that include Multisite Human Participants Research

## What IRBs said to research teams:

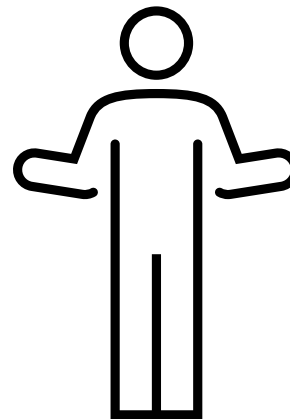
Before Single  
IRB Review



The IRB

Come back to us  
when you get  
your funding!

After Single IRB  
Review



The IRB

Please talk to us  
ASAP when you are  
preparing your  
grant!

You want to train  
your study teams  
to talk to you as  
soon as they are  
aware single IRB  
might be  
required.

## SMART IRB Resource for IRB Fees and Costing Models

### Points to Consider: Fees and Costing Models under the NIH sIRB Policy (pdf):

Points to consider  
regarding charging,  
structuring, and justifying  
fees for single IRB review,  
as well as federal  
regulations on  
direct/indirect costs.

[https://smartirb.org/assets/files/Fees-  
and-Costing-Models.pdf](https://smartirb.org/assets/files/Fees-and-Costing-Models.pdf)

### POINTS TO CONSIDER:

Fees and Costing Models  
under the NIH sIRB Policy

*A guide for Reviewing IRBs*

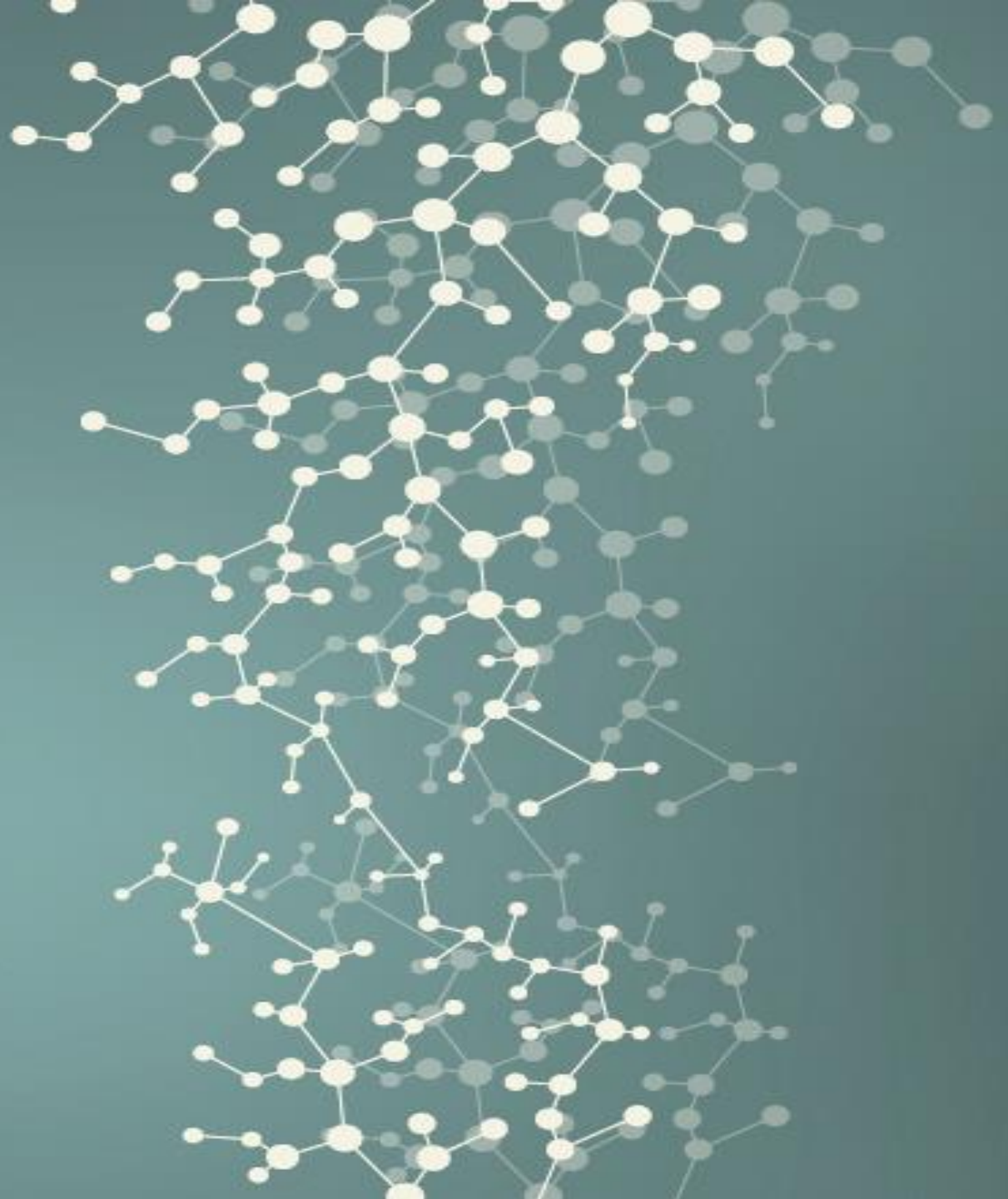


Fees and Charging Models Working Group of the  
SMART IRB Harmonization Steering Committee

April 2018

*Harmonized: This document underwent a review and input process  
from February 2017 to April 2018 and has now been finalized.*

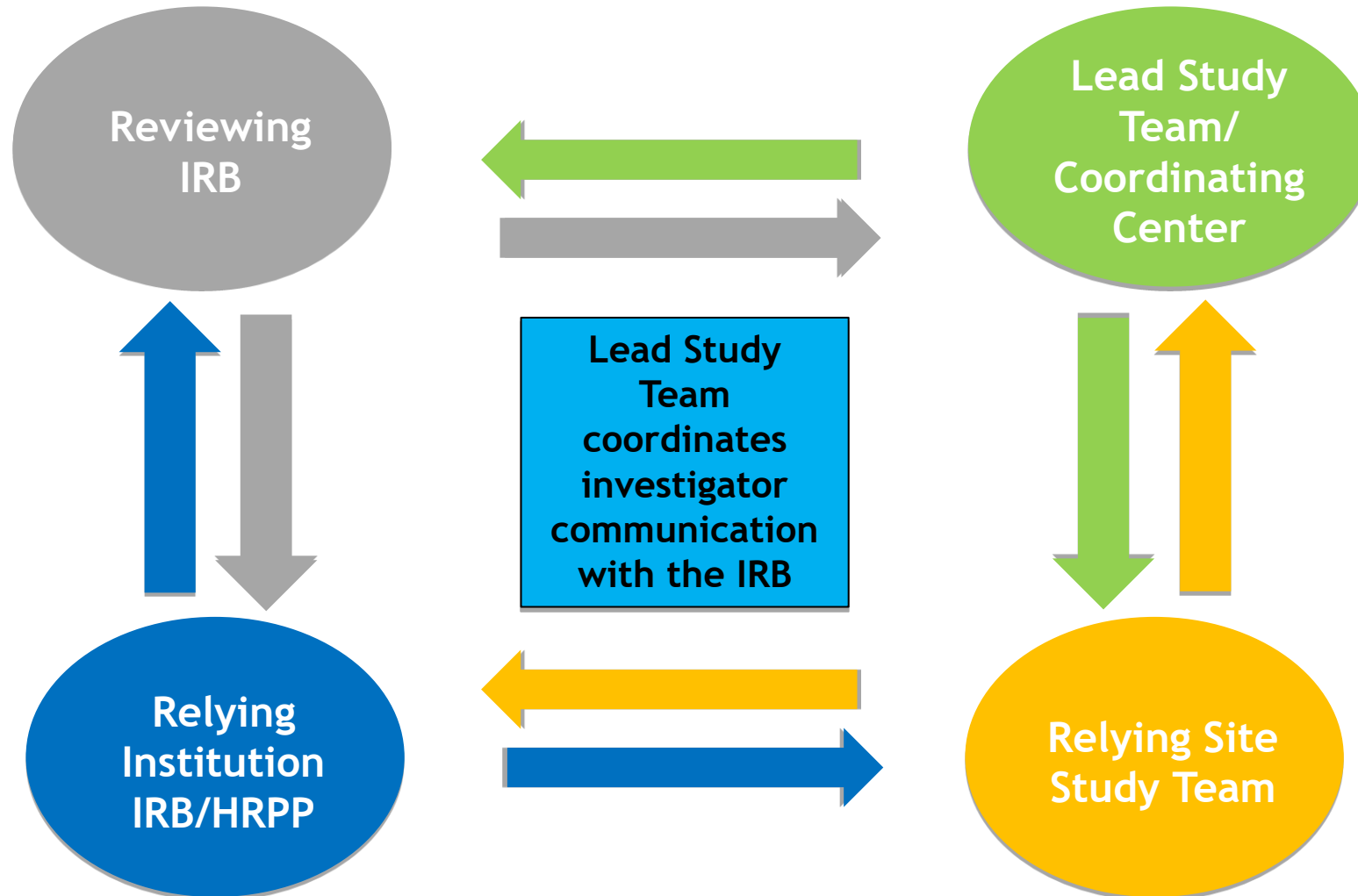
# Responsibilities



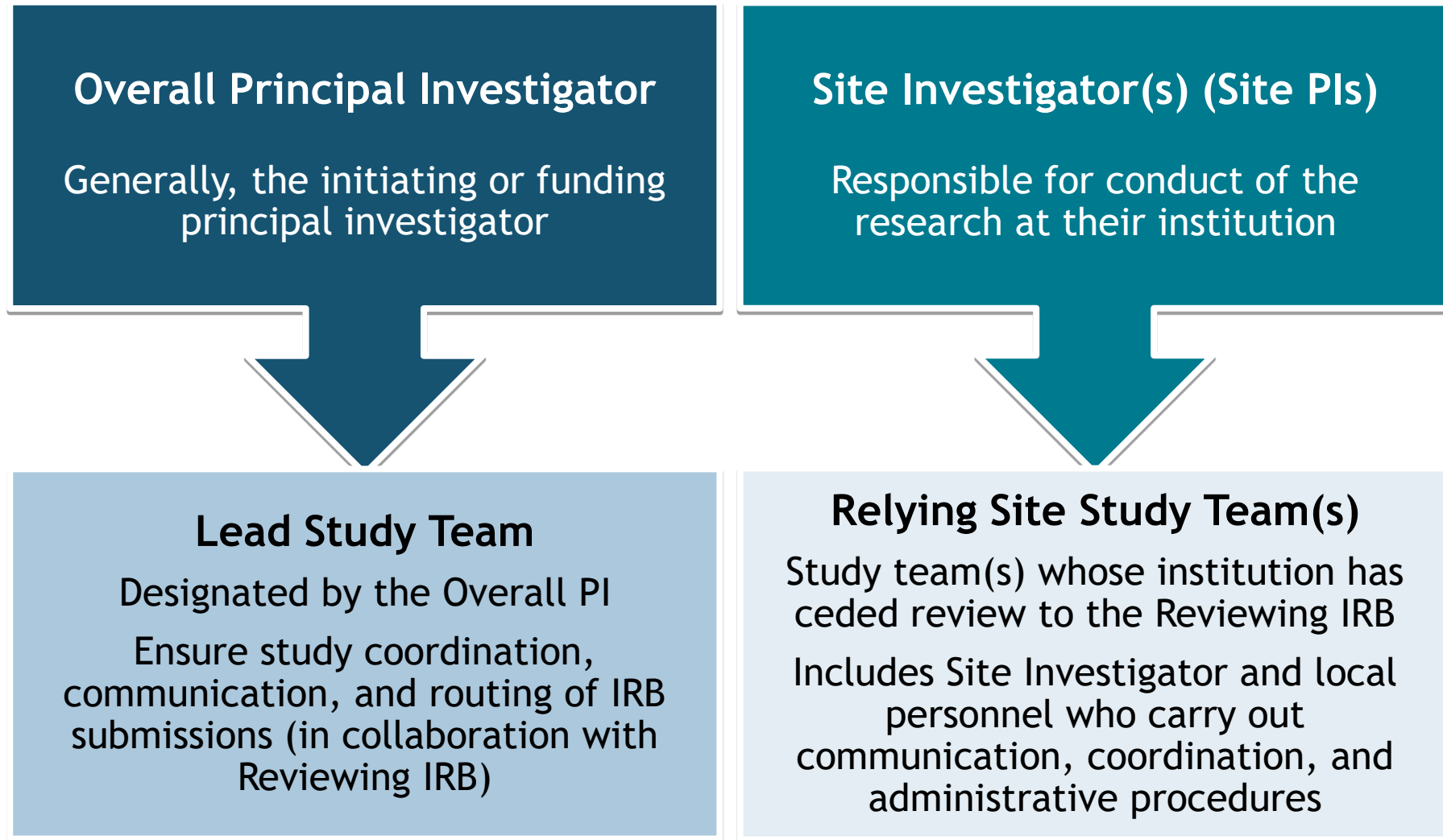
# The Reliance Process: What Study Teams Need to Know

- The process for requesting the use of an external IRB or for their internal IRB to serve as the Reviewing IRB for a multi-site study
- When and how they need to obtain sign off for their single IRB plan
  - Local forms they need to complete
  - Will they use the SMART IRB Reliance System to request a reliance arrangement?
- Their role in the reliance process
  - Who contacts the Reviewing IRB
  - Who coordinates the agreement process

# Common Single IRB Communication Model



# Key Study Team Roles



# Common Lead Study Team Key Responsibilities

**Submit materials to the Reviewing IRB for all sites, including, initial protocol, study-wide and site-specific changes of protocol, continuing reviews, and reportable events (e.g., unanticipated problems, noncompliance, and new information)**

**Provide draft study materials to all site study teams, including proposed consent form template, required checklists, other forms (e.g., local context)**

**Ensure study teams are aware of Reviewing IRB policies and procedures**

**Provide IRB-approved materials/determinations to all site study teams**



## Single IRB Readiness Checklist for Lead Study Teams & Coordinating Centers: Reliance Arrangements

This checklist will assist Lead Study Teams to identify the processes and resources they may need to facilitate a single IRB reliance arrangement for their multi-site research study.



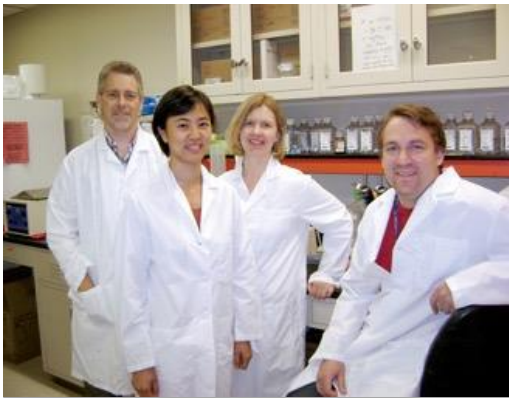
### Single IRB Readiness Checklist for Lead Study Teams & Coordinating Centers: Reliance Arrangements

This checklist will help you identify the processes and resources you may need to facilitate a single IRB reliance arrangement for your multisite research study.

Any item on the checklist that prompts a “No” response means that you may need to address that gap.

AREA	YES	NO	NOTES
1. Have you contacted your local IRB or human research protection office regarding this study? You should contact them prior to completing this checklist.	<input type="checkbox"/>	<input type="checkbox"/>	<i>Enter Additional Notes</i>
2. Have you identified a Reviewing IRB that is willing to serve as the Single Reviewing IRB? Often, but not always, the Reviewing IRB is at the Overall Principal Investigator's institution. <a href="#">Link to helpful Resource for Selecting a Single IRB</a>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Enter Additional Notes</i>
3. Have you identified the reliance agreement the Reviewing IRB will use for this study?	<input type="checkbox"/>	<input type="checkbox"/>	<i>Enter Additional Notes</i>
4. Will the Reviewing IRB use the SMART IRB Agreement?	<input type="checkbox"/>	<input type="checkbox"/>	<i>Enter Additional Notes</i>

# Common Responsibilities for Site PIs & Relying Site Study Teams



\*If the Lead Study Team is from an institution other than the Reviewing IRB Institution, the roles and responsibilities of the “Relying Site Study Team” also apply to the study team at the Reviewing IRB’s institution.

Follow	Provide	Use	Obtain
Follow the policies and procedures of the Reviewing IRB (e.g., for reportable events, personnel changes)	Provide Lead Study Team information about study progress for continuing review and local events (e.g., unanticipated problems, noncompliance) so that it can be reported to the Reviewing IRB	Use the Reviewing IRB’s consent form template (excepting limited local language that can be added/changed)	Obtain authorization from their SMART IRB POCs in the case of personnel changes, COI updates, and/or changes that may be affected by State law or institutional requirements

# SMART IRB Resource: Investigator Checklists

[Overall PI \(and Lead Study Team\) Checklist \(pdf\)](#): Helps Overall PIs (and Lead Study Teams) understand and fulfill their responsibilities.

[https://smartirb.org/assets/files/PI\\_checklist.pdf](https://smartirb.org/assets/files/PI_checklist.pdf)

[Relying Institution PI Checklist \(pdf\)](#): Helps site investigators and study teams understand and fulfill their responsibilities when a study has been ceded to an external IRB.

[https://smartirb.org/assets/files/Relying\\_institution\\_checklist.pdf](https://smartirb.org/assets/files/Relying_institution_checklist.pdf)



**Purpose of form:** The Home Institution for the Overall Principal Investigator and/or Lead Study Team can use this form to provide them with guidance regarding the additional responsibilities accrued in assuming that role, particularly when the SMART IRB Standard Operation Procedures are followed. Language in this document should be adapted to reflect local processes.

## Overall Principal Investigator/Lead Study Team Guidance and Checklist

As the Overall Principal Investigator for a study that may be overseen by a single IRB for all or most sites, you should be aware of your responsibilities when you have agreed to collaborate with an external IRB for oversight of this study:

You should contact the IRB administration or relevant Human Research Protection Program (HRPP) personnel at your institution to:

- Discuss whether your home institution is the IRB of record for this study or if you will be ceding oversight to an external IRB (both). The Lead Study Team should be consulted on this decision.
- Provide them with details about the study (including your study team's role), the proposed reviewing IRB, and the lead investigator's name and institution.
- Identify all sites that will be participating in the study.

If your institution agrees to single IRB oversight, you should provide a reliance request to the IRB of record.

- ☐ Works in collaboration with the Reviewing IRB for communicating and coordinating with collaborators at other sites, including procedures and training materials).

Promptly responds to questions or requests for information from the Reviewing IRB, or your local IRB/HRPP.

Participates in conference calls regarding the study as requested by the Lead Study Team, Reviewing IRB, or your local IRB/HRPP.

Provides the Site Investigators with information for reporting unanticipated problems.

Provides participating Relying Site Investigators with information for consent and authorization forms, procedures, and training materials.

Prepares and submits IRB application updates, local reportable events, and other events required by the Reviewing IRB to be reported and within the timeframes required.

As part of preparing the IRB application, you should:

- Have a mechanism in place for the Home Institution to provide information about recruitment materials and other events required by the Reviewing IRB to be reported and within the timeframes required.

Funded by the NIH Clinical and Translational Science Awards (CTSA) Program, grant number UL1TR001102-04S1



**Purpose of form:** Relying institutions can use this form to provide their local study teams with guidance regarding the investigator's responsibilities when a study is under the oversight of an IRB external to their institution, particularly when the SMART IRB Standard Operation Procedures are followed. Language in this document should be adapted to reflect local processes.

## Relying Investigator Guidance and Checklist

As Principal Investigator at the **Relying Institution** for a study that may be overseen by an external IRB, you should be aware of your responsibilities. Once you have agreed to collaborate with an investigator at another institution and intend to use an external IRB for oversight of this study:

You should contact the IRB administration or relevant Human Research Protection Program (HRPP) personnel at your institution to:

Discuss whether ceding IRB oversight to an external IRB is appropriate.

Provide them with details about the study (including your study team's role), the proposed reviewing IRB, and the lead investigator's name and institution.

Obtain a copy of the studywide protocol and template consent documents(s), which will help facilitate the discussion with your local IRB/HRPP.

If your institution agrees to cede review to an external IRB, you will be asked to:

Provide the IRB administration or relevant HRPP personnel at your institution with:

- The names and roles of all key study personnel on the local study team
- ☐ Any management plans for potential conflicts of interest (COI) relevant to the study that will be ceded to the external IRB, including any new or altered management plans put in place throughout the lifespan of the study.

Register the study at your institution according to local processes, such as creating a shell study in the local electronic system and uploading documents received.

Promptly respond to questions or requests for information from the Lead Study Team (or their designee) as well as from the Reviewing IRB.

Participate, as required, in conference calls regarding a study as requested by the Lead Study Team, Reviewing IRB, or your local IRB/HRPP.

Become familiar with the reportable event policy of the Reviewing IRB to ensure that you appropriately report protocol deviations, noncompliance, significant subject complaints, subject injuries, unanticipated problems, or other events required by the Reviewing IRB to be reported and within the timeframes required.

Ensure that all local reviews and sign offs that, in addition to IRB approval, are in place before a study is activated, such as coverage analysis, department approvals, data use agreements, material transfer agreements, ancillary committee reviews (e.g., radiology, nursing, and pharmacy).

- ☐ Work with the Lead Study Team and the IRB/HRPP POC from your institution to incorporate locally required language into the consent template to be used by the local study team, such as institutionally required compensation for injury language, local study team contact information, and additional costs that subjects may incur that differ from those identified in the template consent form.
- ☐ For externally funded studies, provide your sponsored programs office with documentation that IRB oversight for a study has been ceded to and approved by an external IRB.

# SMART IRB Resource: FAQs for Research Teams

[FAQs for Research Teams - Relying on an External IRB \(pdf\)](https://smartirb.org/assets/files/Relying_on_an_External_IRB_FAQs_for_Study_Teams.pdf): Provides helpful hints for study teams whose institutions have agreed to rely on an external IRB.

[https://smartirb.org/assets/files/Relying on an External IRB FAQs for Study Teams.pdf](https://smartirb.org/assets/files/Relying_on_an_External_IRB_FAQs_for_Study_Teams.pdf)

**Customizable FAQ Template:**  
Institutions may download the [FAQs for Research Teams Relying on an External IRB \(docx\)](#) to create institution-specific guidance.



## Relying on an External IRB: FAQs for Research Teams

Version Date: November 14, 2017

The purpose of this document is to provide helpful hints for study teams whose institutions have agreed to rely on an external IRB.

### *What does relying on an external IRB mean?*

Institutions may agree to use an IRB outside their institution to oversee a research study or studies. This is called ceding or deferring IRB review.

### *How do I know whether a study can be ceded to an external IRB?*

Please contact your institution's [SMART IRB point of contact \(POC\)](#), or check with the office at your site responsible for making determinations regarding whether IRB review will be ceded to an external IRB (usually the IRB office), to find out:

- what research qualifies for ceded review
- how to make requests for ceding IRB review, and
- what, if any, agreement may be in place to cover the specific IRB review arrangement.

### *Does my institution need to sign an agreement in order to rely on an external IRB?*

Generally, a written agreement between the institutions must be executed for an institution to rely on an external IRB. The agreement spells out the responsibilities of the institution providing IRB review as well as the institution relying on the external IRB.

### *What is the SMART IRB Agreement?*

The SMART IRB Agreement is a national **master agreement** that allows institutions to avoid having to negotiate individual agreement per study or group of studies. More information about SMART IRB is at <https://smartirb.org> and a list of institutions that have joined SMART IRB by signing onto the agreement is at <https://smartirb.org/participating-institutions/>.

### *Do I need to obtain sign-off from my home institution, such as from its IRB office, to use an external IRB?*

Generally, yes. Because institutions need to identify the research that falls under their purview, even if an IRB outside the institution oversees some or all of its research, they usually require researchers at least to alert appropriate institutional officials about a study they wish to have reviewed by an external IRB. Institutions often require institutional sign-off before the study can be reviewed by an external IRB. The mechanism by which this "registration" occurs varies by institution. Some, for example, require researchers to provide a brief application in the local electronic submission system. Study teams should check to find out what their institutional requirements are in regard to the use of an external IRB.

[www.smartirb.org](http://www.smartirb.org)

Funded by the NIH National Center for Advancing Translational Sciences through its Clinical and Translational Science Awards Program, grant number UL1TR001102-04S1.

## Local Context: What Study Teams Need to Know

- What local context information they are responsible for providing and to whom
  - Any procedures that will differ locally from what is described in study protocol
  - If the standard of care at their organization is different
- How to create a consent form that includes required institutional language



# SMART IRB Guidance: Inserting “Local Context” Language in Informed Consent Documents (pdf)

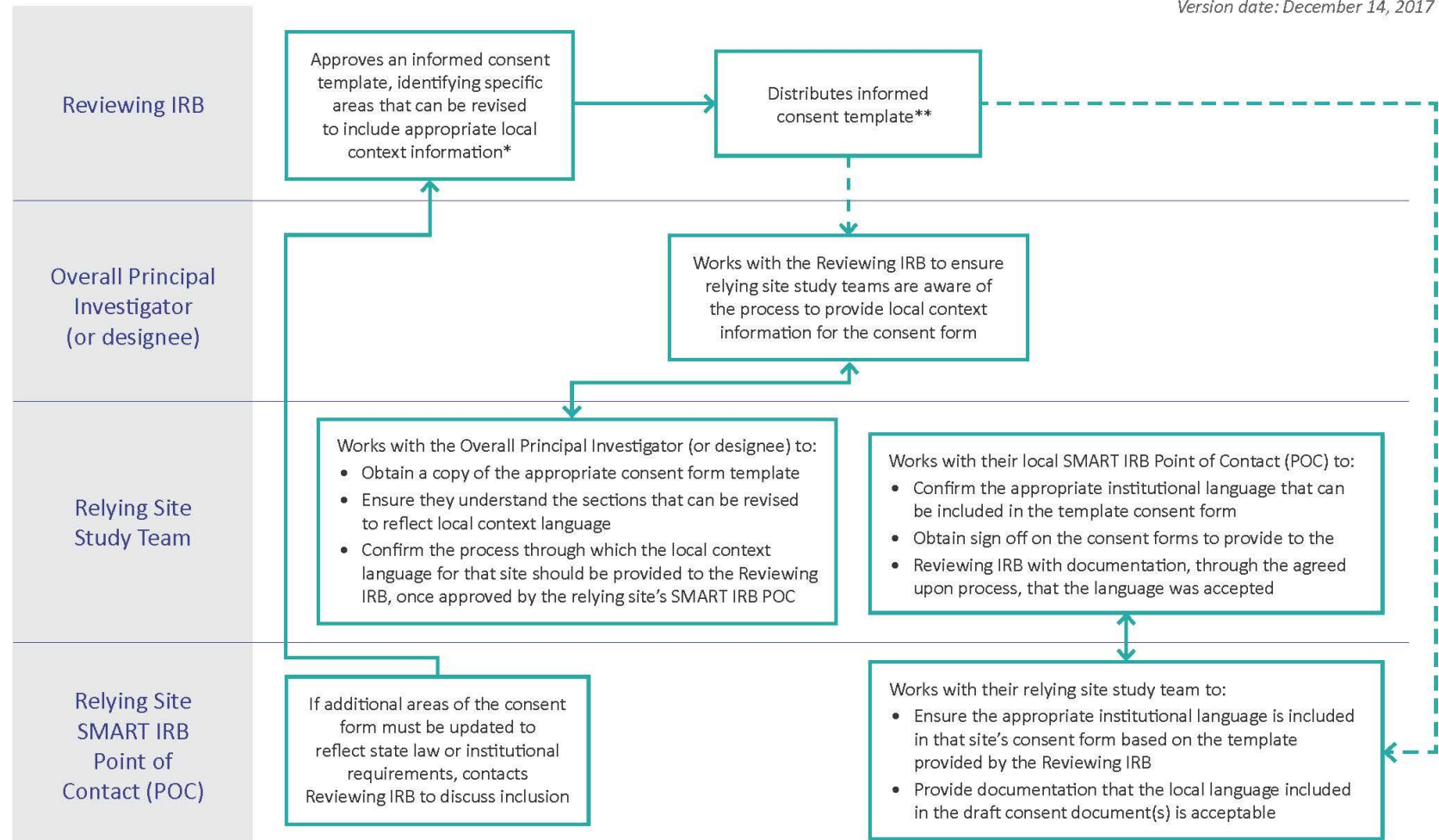
- Illustrates roles the Reviewing IRB, Overall PI, Relying Site Study Team, and Relying Institution POC may play in providing information and language for local consent forms.



## SMART IRB Guidance:

### Inserting “Local Context” Language in Informed Consent Documents

Version date: December 14, 2017



\*Template areas that can be changed are usually limited to:

- Contact information for local study team
- Costs that differ for the relying site
- Relying site's language regarding the availability of and compensation for research-related injury

\*\*The Reviewing IRB can distribute the template to the Overall Principal Investigator (or designee) AND/OR the Relying Site SMART IRB POC.

[www.smartirb.org](http://www.smartirb.org)

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

SMART IRB encourages use and distribution of this content. If you extract any language, please cite SMART IRB as follows, "This information was obtained from [doc name] as part of SMART IRB, which is funded by the NIH National Center for Advancing Translational Sciences through its Clinical and Translational Science Awards Program, grant number 3UL1TR002541-01S1."

# SMART IRB Resource: Communication plan for single IRB review

Document key communication roles, e.g., submitting initial and continuing reviews, amendments, and reportable events; providing conflict of interest management plans; and providing IRB-approved documents and communicating Reviewing IRB determinations.

[Download the Communication Plan \(pdf\)](#)

[Download the Communication Plan \(customizable Word document\)](#)



**Purpose of the form:** This form can be used by Reviewing IRBs and others to identify and document key communication roles for a study. It is recommended that the form be used to document the various responsibilities. However, the form also could be used less formally to guide conversations among the Reviewing IRB, Relying Institutions, and Lead Study Team.

## Template Communication Plan for SMART IRB

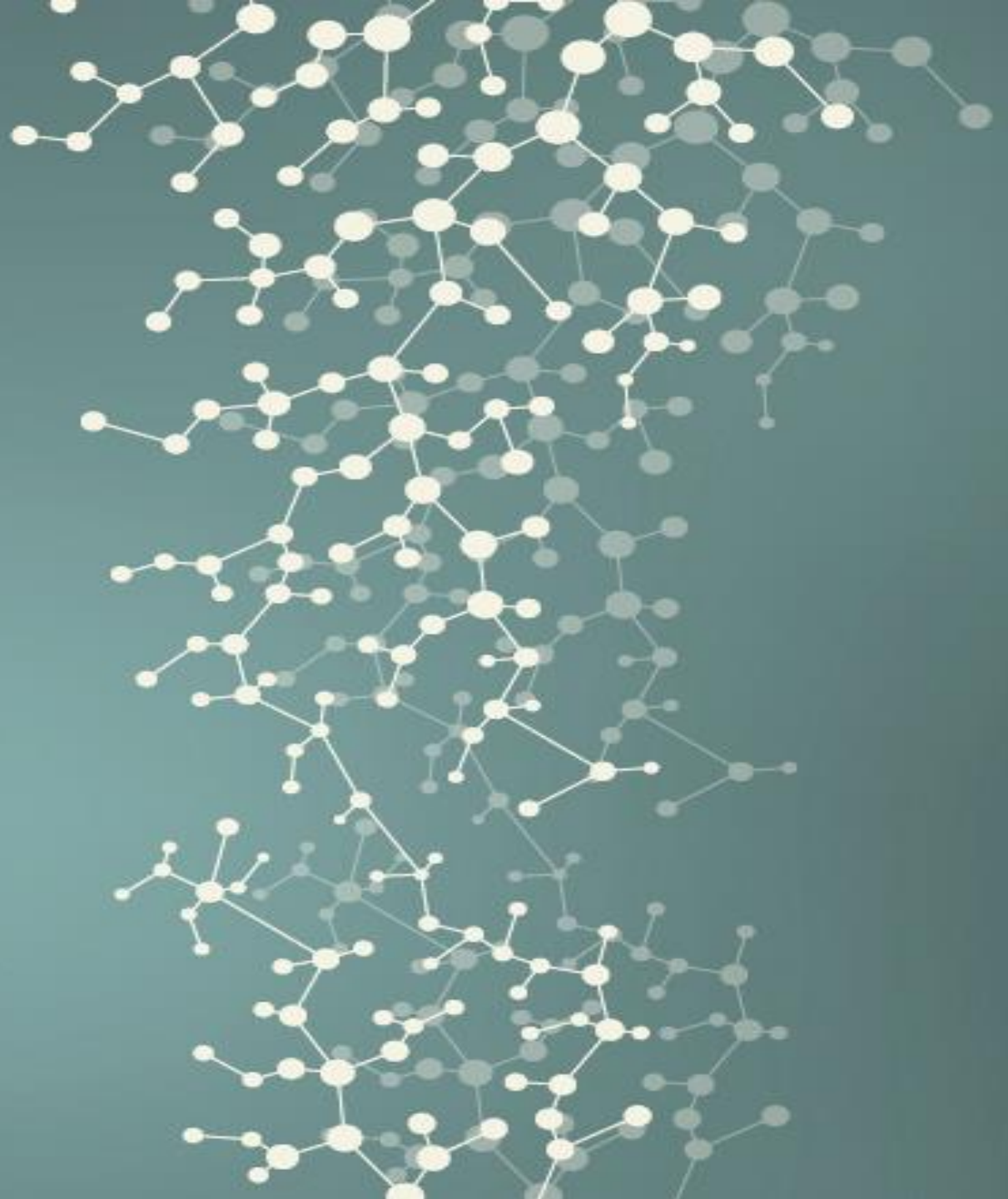
### Definitions

- **REVIEWING IRB – Point of Contact (POC):** Main person responsible for addressing questions related to the Reviewing IRB's policies and procedures and review status for a ceded study
- **LEAD STUDY TEAM – POC:** Main person responsible for communication with the Reviewing IRB and facilitating communication between relying site study teams and the Reviewing IRB regarding the ceded study
- **RELYING SITE – POC:** Main person responsible for communication with the Reviewing IRB and local study team regarding the ceded study (e.g., personnel in the local IRB office or local human research protection program personnel)
- **RELYING SITE STUDY TEAM POC:** Main person responsible for communication with the Lead Study Team regarding the ceded study

### Communication Plan

COMMUNICATION RESPONSIBILITY	RESPONSIBLE PARTY	NOTES
<b>COI:</b> Providing applicable conflict of interest management plans for relying site study teams to the Reviewing IRB	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Site Study Team(s) <input type="checkbox"/> Relying Site(s) POC(s) <input type="checkbox"/> Other, specify: <div></div>	
<b>STUDY TEAM TRAINING &amp; QUALIFICATIONS:</b> Providing confirmation to the Reviewing IRB that relying site study teams have completed relevant training and are qualified to conduct the proposed research	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Site Study Team(s) <input type="checkbox"/> Relying Site(s) POC(s) <input type="checkbox"/> Other, specify: <div></div>	
<b>LOCAL CONTEXT INFORMATION:</b> Providing local context information to the Reviewing IRB regarding state laws and institutional requirements that pertain to the review of the ceded study	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Site Study Team(s) <input type="checkbox"/> Relying Site(s) POC(s) <input type="checkbox"/> Other, specify: <div></div>	

# Ongoing/Other Study Team Responsibilities





# Institutional Requirements

Helping study teams understand and meet institutional requirements for study activation, such as:

- Ancillary committee approvals
- Expectations for any local reporting (e.g., reportable events)

# Post-Reliance Requirements

## Helping study teams understand:

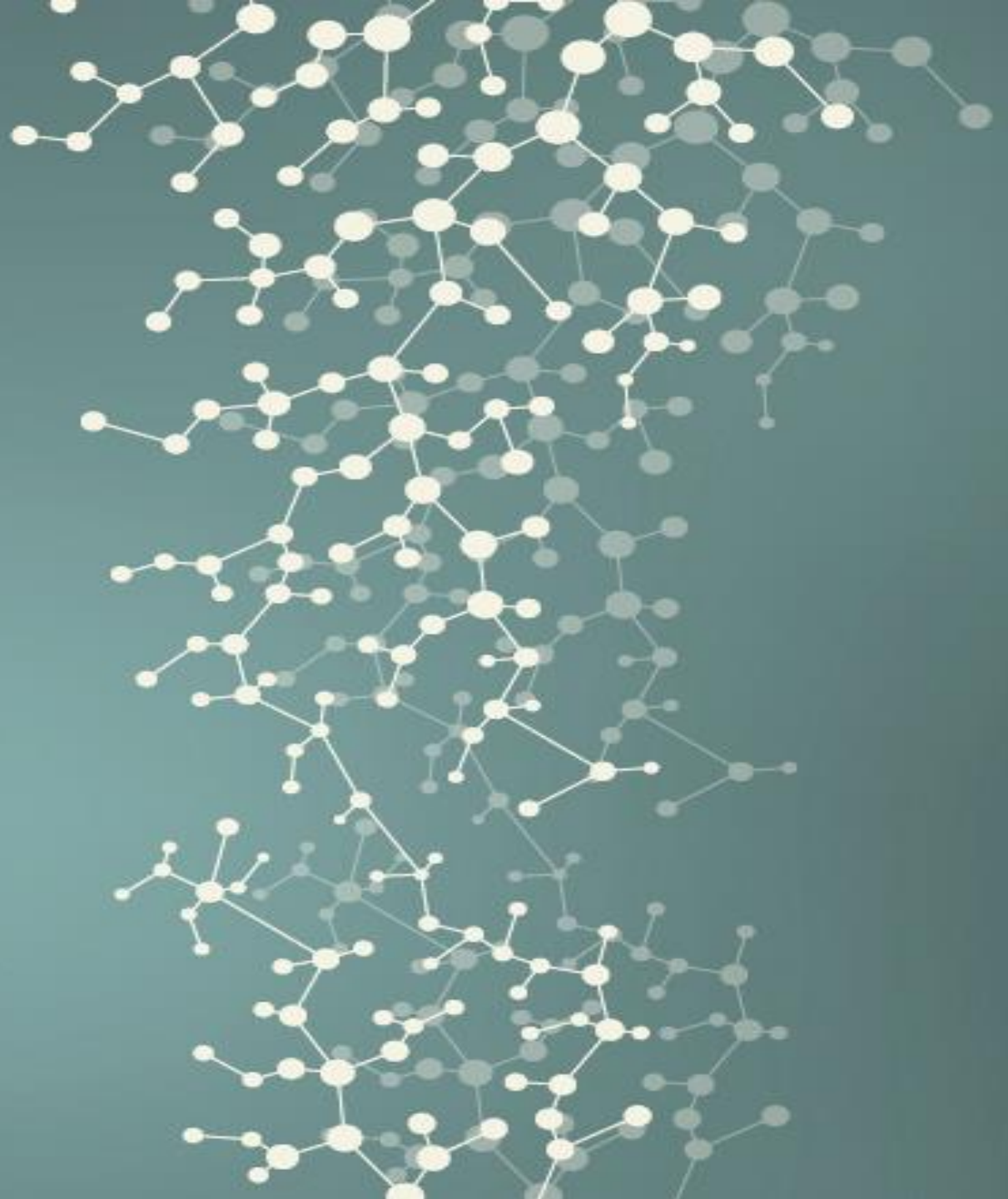
What to report to the Reviewing IRB and adhering to the Reviewing IRB's policies, such as for:

- Reportable events
- Personnel updates, including when they trigger the need to communicate a new or updated conflict of interest management plan

What information to provide to the Reviewing IRB, such as:

- Site-specific amendments
- Continuing review (or providing information to a lead study team for the continuing review)
- Reportable events

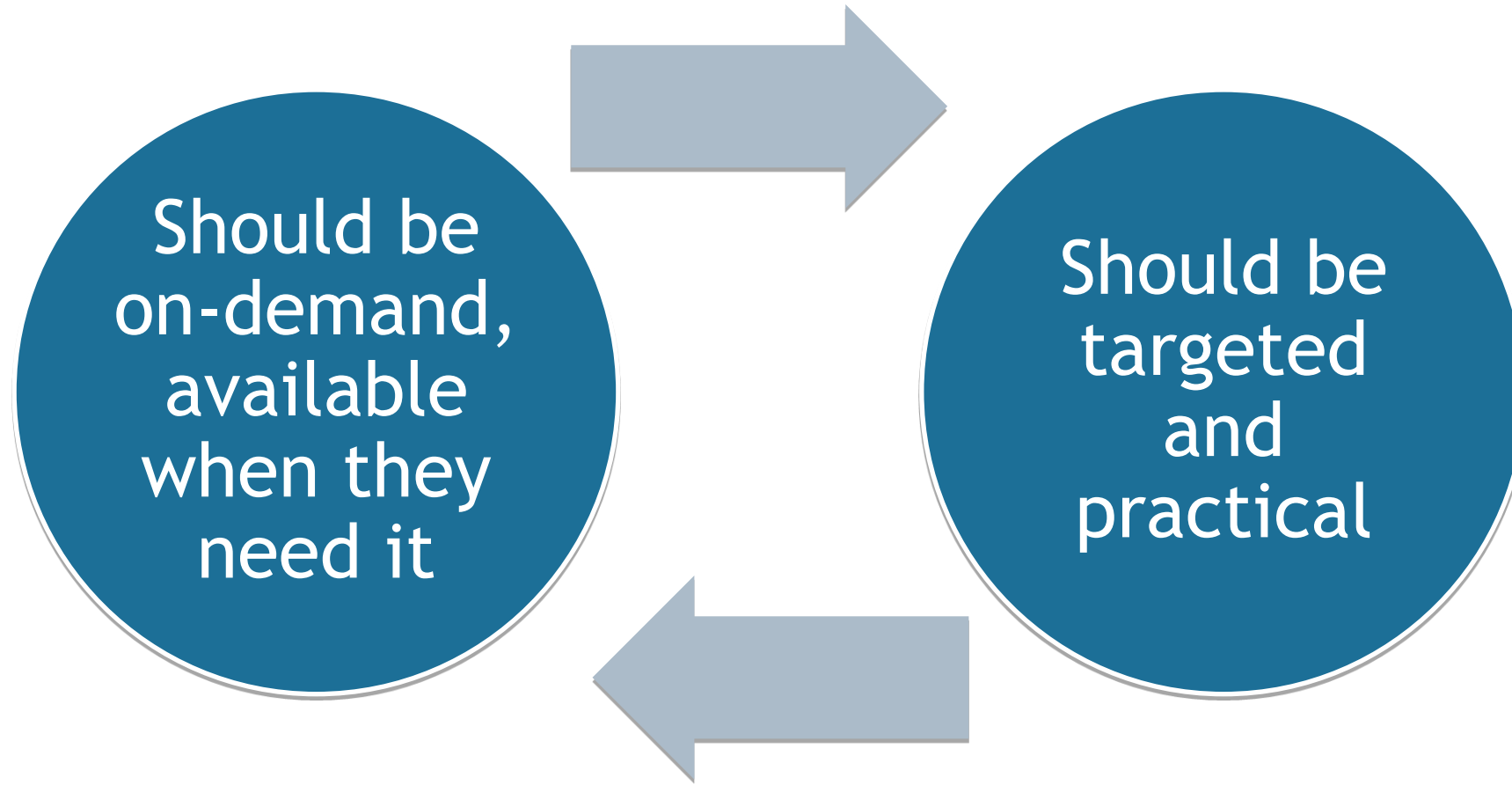
# Training Approaches



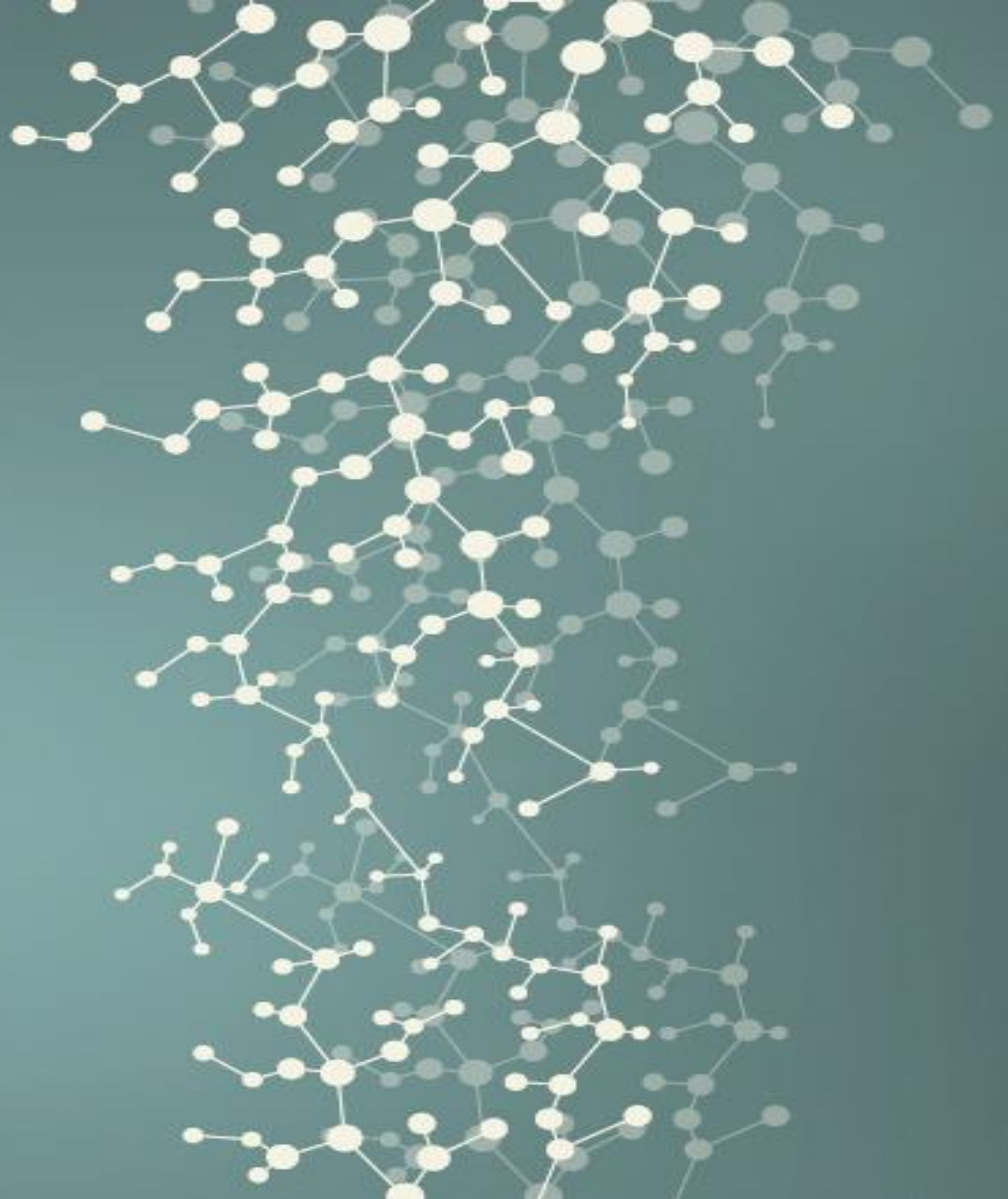
# A model: one-on-one, study specific training

- Many organizations designate a staff person to meet with study teams to discuss:
  - What single IRB is and how it is different from local IRB review
  - Responsibilities the study team assumes, especially if they serve as a Lead Study Team
  - The steps in the reliance process
  - Local requirements and institutional policies that must be followed at initial IRB review and throughout the life of the study

# Another Approach to Study Team Training



# Resources to Support Training






# SMART IRB Resources for Study Teams

<https://smartirb.org/study-teams/>

On-demand, short videos and key resources aid in planning and implementation of single IRB arrangements.

1414 Participating Institutions including all CTSA hubs

Reliance System: Log In >

Reliance Agreement ▾Reliance System ▾HarmonizationResources & Education ▾Support ▾

LEARNING CENTER

For Investigators & Study Teams

Guidance for navigating single IRB arrangements

SMART IRB Start-Up Packages

Introduction to Single IRB Review and SMART IRB

NIH Single IRB Policy

Selecting a Single IRB

Developing a Single IRB Plan

Potential Effects of NIH Single IRB Policy on Research Costs

## SMART IRB Start-Up Packages

Collected resources to help you prepare for and fulfill your responsibilities related to single IRB arrangements. Each package includes a guide describing how and when to use the resources as well as links to online tools and further information. [Contact your institution's SMART IRB POC](#) for more information about processes at your institution.

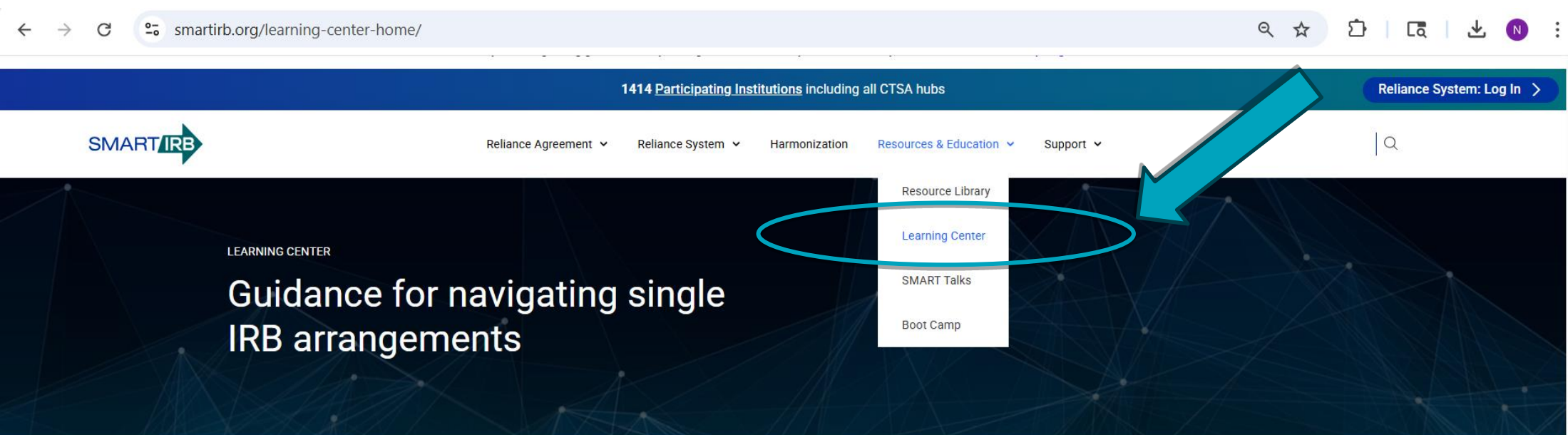
Study Team Package

Download

Federal Grant Preparation Package

Download

# Customizing the Training: Go to smartirb.org



## Single IRB Learning Center

Education, on-demand training, and packaged resources to help investigators, study teams, and IRB/HRPP staff and institutions successfully plan for and navigate single IRB arrangements.

### Investigators & Study Teams

Learn about your responsibilities related to single IRB and download start-up packages to help you plan your study and navigate IRB reliance arrangements.

[GET STARTED >](#)

### IRB/HRPP Staff & Institutions

Learn about the roles and responsibilities of Reviewing IRBs and Relying Institutions and download start-up packages to help you implement the SMART IRB Agreement.

[GET STARTED >](#)





# Customizing the Training: Go to smartirb.org



1414 Participating Institutions including all CTSA hubs

Reliance System: Log In >



Reliance Agreement ▾

Reliance System ▾

Harmonization

Resources & Education ▾

Support ▾



LEARNING CENTER

## Guidance for navigating single IRB arrangements

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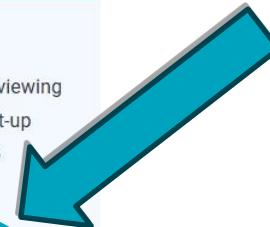
Learn about your responsibilities related to single IRB and download start-up packages to help you plan your study and navigate IRB reliance arrangements.

GET STARTED >

#### IRB/HRPP Staff & Institutions

Learn about the roles and responsibilities of Reviewing IRBs and Relying Institutions and download start-up packages to help you implement the SMART IRB Agreement.

GET STARTED >



# Customizing the Training: Go to smartirb.org

LEARNING CENTER

## For IRB & HRPP Administrators

Successfully manage single IRB arrangements

### SMART IRB Start-Up Packages

Implementing the SMART IRB Agreement

Serving as a Reviewing IRB

Responsibilities of Relying Institutions

Reliance System Walkthrough

Resources for IRB and HRPP Personnel

Training for Investigators and Study Teams

## SMART IRB Start-Up Packages

Collected resources to help you understand and fulfill your roles and responsibilities in a single IRB arrangement. Each package includes a guide describing how and when to use the resources, as well as links to online tools and further information.

Reviewing Institution Package

Download

Relying Institution Package

Download

# Download and Edit



Reliance Agreement ▼

Reliance System ▼

Harmonization

Resources & Education ▼

Support ▼

Training for Investigators and Study Teams

## Training for Investigators and Study Teams

SMART IRB offers a suite of training videos and resources that may be used as is or customized to reflect local processes and policies.

- [Visit the Learning Center for Investigators and Study Teams](#) to view available materials; send investigators here for self-guided learning.
- [Download presentations \(no audio\)](#) to use for local trainings or customize to reflect local processes.
- Download presentations with embedded audio:
  - [Developing a Single IRB Plan](#)
  - [Overview of the NIH Single IRB Policy for Researchers](#)
  - [Potential Effects of Single IRB on Research Costs](#)
  - [Selecting a Single IRB](#)
  - [Single IRB review and SMART IRB](#)
  - [Study Team Roles Related to Single IRB](#)

# SMART IRB Study Team Advisory Meeting (STEAM)

The SMART IRB Study Team Advisory Meeting was established to obtain input from investigators and study teams on the best ways to navigate single IRB review arrangements for their studies.

## Goals

1. Identify ways to better engage study teams in the sIRB process
2. Improve dissemination and utilization of current SMART IRB research team resources.
3. Learn what works well with the process for study teams and areas that present challenges.

## Recent STEAM Guidance Documents

- Guidelines for Study Teams: Enhancing Standardization of the sIRB Process at Relying Sites
- Relying on an External Single IRB: FAQs for Relying Site Study Teams

STEAM meets quarterly by Zoom. The next meeting will be held later this fall.

*Know study team members that might want to join STEAM or learn more? Have them reach out to Mike Linke at [linkemj@uc.edu](mailto:linkemj@uc.edu).*

A large teal arrow pointing to the right, with a white rectangular area on the left side containing the word "Questions".

Questions



# Harmonization Guidance

Nichelle Cobb, PhD, CIP  
AAHRPP Senior Advisor for Strategic Initiatives

# Goals of Single IRB Review

- NIH Single IRB policy
  - “enhance and streamline the IRB review process in the context of multi-site research so that research can proceed as effectively and expeditiously as possible.”
- Common Rule
  - “Mandated single IRB review would ultimately **decrease administrative burdens and inefficiencies** for investigators and institutions.”

# Feedback from Investigators, Study teams & HRPPs

## Challenges Encountered

- Differences across sites with sIRB makes things difficult
- Lack of harmonization at Relying Institutions
- Institutions only use SMART IRB Online Reliance System (ORS) for certain types of studies
- Not all sites use the ORS
- Institutions require significant/lengthy dual review



# Harmonization

## Harmonization Steering Committee (HSC)

- To promote a more strategic, effective, efficient and cooperative approach to policies, processes and procedures related to single IRB review of multisite studies

### Co-chairs:

**Barbara E. Bierer, MD**

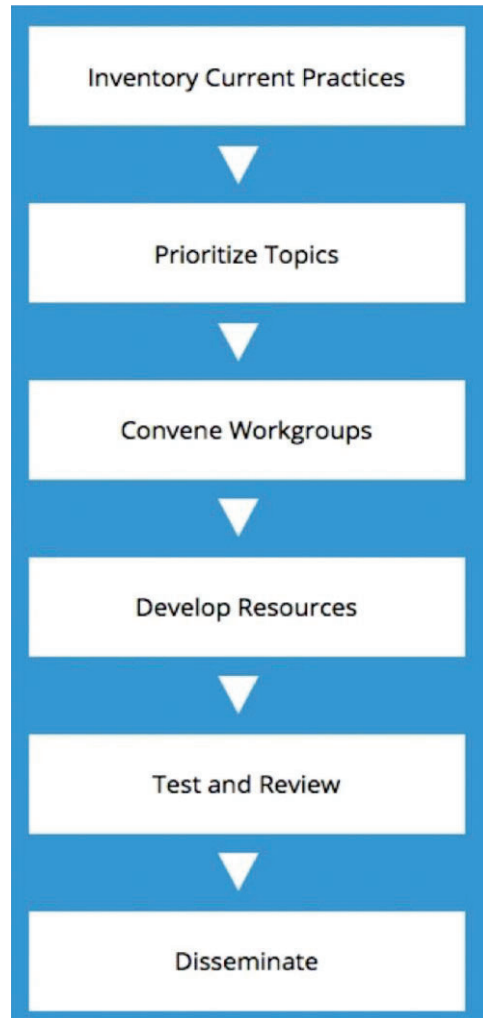
Director of Regulatory Policy, SMART IRB

**Erica Rosemond, PhD**

Deputy Director, Division of Clinical Innovation, National Center for Advancing Translational Sciences (NCATS), National Institutes of Health

The HSC and its working groups follow an iterative development cycle guided by content experts, and responsive to public review and comment.

# HSC: Iterative development cycle



## Finalized:

- Institutional Profile
- Protocol-specific Document
- Fees & Costing Models Guidance
- Institution v. IRB Responsibilities Guidance
- Reportable Events
- Single IRB Review: Responsibilities Associated with the Review of Study Personnel
- Conflict of Interest Review
- Post-approval Auditing
- Single IRB Continuing Review Process
- Ancillary Reviews Harmonization

## In Progress:

- Local Context

## Subcommittees' focus:

- Through “Emerging Issues Workshop” to HSC for selection

<https://smartirb.org/harmonization/>

# Harmonization Guidance:

<https://smartirb.org/harmonization/>

- Delineates Relying Institution and Reviewing IRB responsibilities for sIRB research
- Provides templates, checklists and forms to be edited and implemented locally

# Harmonization Guidance: Post-Approval Auditing

943 Participating Institutions  
including all CTSA hubs

Join SMART IRB

SMART IRB AGREEMENT

ONLINE RELIANCE SYSTEM

HARMONIZATION

LEARNING CENTER

RESOURCES

ABOUT US

SUPPORT

## Harmonization

Strategic, efficient, and cooperative approaches to single IRB review.

As institutions apply diverse approaches to implementing single IRB review, new burdens and challenges emerge for investigators, collaborating institutions, and IRBs. One of the goals of SMART IRB is to harmonize these diverse approaches by promoting not only the alignment of policies and processes, but also the adoption of common forms and identification of common practices and workflows.

### Harmonized Documents

#### Recommendations for the Harmonization of Ancillary Reviews **NEW!**

Best practices for defining ancillary reviews and recommendations for centralizing certain reviews as well as for the timing of reviews and allocation of responsibilities in an sIRB context. Zip file includes guidance as well as an implementation checklist for centralizing ancillary reviews.

Download Document

Best viewed in Adobe Reader.

#### Conflict of Interest Review Processes for sIRB Review

Guidance addresses the responsibilities of a Relying Institution and a Reviewing IRB/Reviewing IRB Institution in the COI review process, including specific guidance to assist in determining and managing COI, as well as answers to FAQs.

Download Document

Best viewed in Adobe Reader.

#### Post-Approval Auditing for Studies Subject to Single IRB Review

Identifies best practices and provides tools to support for-cause and not-for-cause audits of studies under a single IRB arrangement. Zip file includes guidance as well as checklists and a template report.

Download Document

Best viewed in Adobe Reader.

#### Single IRB Continuing Review Process

Recommendations for the roles and responsibilities of Reviewing IRBs, Relying Institutions, Overall PIs, and Relying Site Investigators as they relate to the continuing review process.

Download Document

Best viewed in Adobe Reader.

#### Single IRB Review: Responsibilities Associated with the Review of Study Personnel

Recommendations for ensuring study personnel are appropriately trained and qualified to conduct the research under review.

Download Document

Best viewed in Adobe Reader.

#### Reportable Events

- Recommendations for investigator-initiated multisite studies
- Reviewing noncompliance and unanticipated problems
- Ensuring prompt reporting

Download Document

Best viewed in Adobe Reader.

## Post-Approval Auditing for Studies Subject to Single IRB Review



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# Checklists and Templates



Harmonized: This document underwent a review and input process from December 2020 to April 2021 and has now been finalized.

**SMART IRB**

**SAMPLE FOR-CAUSE AUDIT NOTIFICATION CHECKLIST**  
FOR USE BY THE REVIEWING IRB REQUESTING THE AUDIT

STUDY TITLE: \_\_\_\_\_

PRINCIPAL INVESTIGATOR: \_\_\_\_\_

PARTICIPATING SITE FOR AUDIT: \_\_\_\_\_

SITE INVESTIGATOR: \_\_\_\_\_

RELYING INSTITUTION POINT OF CONTACT: \_\_\_\_\_

SPONSOR: \_\_\_\_\_

Funding Sources (check all that apply): ☐ Industry Sponsor ☐ Foundation ☐ Government/NIH ☐

Type of Study: ☐ Drug/Biologic ☐ Device ☐ Tissue/Sample Repository ☐ Genetics ☐

☐ Questionnaire ☐ Chart Review/Database ☐ Other: \_\_\_\_\_

**WHAT CONCERNS PROMPTED THE REQUEST FOR AN AUDIT?**

☐ Reviewing IRB has reason to suspect serious or continuing noncompliance or unanticipated problem involving research or others based on information received in a submission or upon report of an investigator or other member of the research team.

☐ Report of concerns from a third party (e.g., participant or sponsor complaints, institutional official request for review, government agencies (e.g., FDA, NIH, OHRP)).

☐ Reason to need verification that the Research is being conducted in accordance with the IRB-approved protocol (including known/suspected issues with study conduct, data integrity, etc.).

Comments and additional information: \_\_\_\_\_

**DOCUMENTS AND INFORMATION THAT THE REVIEWING IRB REQUESTS TO BE REVIEWED IN ORDER TO MAKE A DETERMINATION REGARDING NON-COMPLIANCE?** (include relevant subject selection and/or percent of records to be reviewed with explanation)

☐ Current Protocol in use by site

☐ Current Consent Documents in use by site

☐ Investigator/Study Team Training Documentation

☐ Source Documentation (Specify): \_\_\_\_\_

☐ Other (e.g., Relying Institutions Policies, Study Manuals, Investigator Brochures, Notes to file, Adverse Event Reports, Deviation logs, etc.) (Specify): \_\_\_\_\_

☐ Additional information (Specify): \_\_\_\_\_

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1

Harmonized: This document underwent a review and input process from December 2020 to April 2021 and has now been finalized.

**SMART IRB**

**SAMPLE AUDIT CHECKLIST**  
FOR USE BY INDIVIDUAL(S) CONDUCTING THE AUDIT

**A. REGULATORY DOCUMENTATION**

1. Is the approved protocol on file? (Original and all previously approved versions?)

1.1 Is the IRB Approval Letter(s) on file?

1.2 Is this an FDA regulated study? (If no, go to 1.3)

1.2.1 Is there a signed FDA 1572 on file?

1.2.2 Are all versions of the Investigator Brochure or package insert on file?

1.2.3 Are all versions of the package insert or device manual on file?

1.2.4 Is all correspondence to and from the FDA on file?

1.3 CVs of PI/Co-PI and all study staff on file?

1.3.1 For all CVs on file, are they current in alignment with applicable requirements?

1.3.2 For all CVs on file, are they signed and dated, if required?

1.3.3 Is there a staff training log?

1.3.4 Is the staff training log complete and up-to-date?

1.4 Is there a subject enrollment log?

1.4.1 Is the subject enrollment log complete?

1.5 Is/will the site (be) monitored?

1.5.1 Who is the monitoring body? \_\_\_\_\_

1.5.2 How often? \_\_\_\_\_

1.5.3 Is there a monitoring log?

1.5.4 If yes, is the monitoring log complete?

1.6 Is there a staff signature and delegation of responsibilities log?

1.6.1 Is the staff signature and delegation log complete and up-to-date?

1.7 Is all correspondence to and from the sponsor on file?

1.8 Are lab tests required?

1.8.1 If yes, is a copy of normal lab values on file?

1.8.2 Is a copy of the lab certification on file?

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1

Harmonized: This document underwent a review and input process from December 2020 to April 2021 and has now been finalized.

**SMART IRB**

**SAMPLE AUDIT REPORT TEMPLATE<sup>1</sup>**

PROTOCOL TITLE: \_\_\_\_\_

PRINCIPAL INVESTIGATOR: \_\_\_\_\_

\_\_\_\_\_  
Department, School

FUNDING SOURCE: \_\_\_\_\_

DATE OF REVIEW: \_\_\_\_\_

AUDITORS: \_\_\_\_\_

\_\_\_\_\_  
CONFIDENTIAL

DATE OF REPORT: \_\_\_\_\_

DISTRIBUTION: \_\_\_\_\_

PI Name

1. Howes, L. M., White, S. A., & Bierer, B. E. (2019). Quality Assurance and Quality Improvement Handbook for Human Research (1st ed.). Johns Hopkins University Press.

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Funded by the NIH National Center for Advancing Translational Sciences through its Clinical and Translational Science Awards Program, grant number UL1TR001102-04S1.

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# Recommendations for the Harmonization of Ancillary Reviews

The screenshot shows the SMART IRB website. At the top, there is a navigation bar with links: SMART IRB AGREEMENT, ONLINE RELIANCE SYSTEM, HARMONIZATION (highlighted), LEARNING CENTER, RESOURCES, ABOUT US, and SUPPORT. A banner at the top right states '943 Participating Institutions including all CTSA hubs' and a 'Join SMART IRB' button. Below the navigation bar, the 'Harmonization' section is displayed with the subtitle 'Strategic, efficient, and cooperative approaches to single IRB review.' A paragraph explains the goal of SMART IRB: 'As institutions apply diverse approaches to implementing single IRB review, new burdens and challenges emerge for investigators, collaborating institutions, and IRBs. One of the goals of SMART IRB is to harmonize these diverse approaches by promoting not only the alignment of policies and processes, but also the adoption of common forms and identification of common practices and workflows.' Below this is a 'Harmonized Documents' section with three cards. The first card, 'Recommendations for the Harmonization of Ancillary Reviews' (marked 'NEW!'), is highlighted with a blue arrow. The other two cards are 'Conflict of Interest Review Processes for sIRB Review' and 'Post-Approval Auditing for Studies Subject to Single IRB Review'. Each card has a 'Download Document' button and a note 'Best viewed in Adobe Reader.'

- Challenges
- Recommendations
  - Ancillary Review Definitions
  - Centralizing Ancillary Reviews for sIRB
  - Timing of Ancillary Reviews
  - Allocating Ancillary Review Responsibilities
- Implementation Checklist
- Ancillary Reviews that may be centralized after sIRB approval

# Harmonization

- Significant work accomplished by leaders, operations, and compliance professionals
- Use whatever resources you find
- “If you see something, say something”
  - Polly Goodman at [Polly\\_Goodman@hms.harvard.edu](mailto:Polly_Goodman@hms.harvard.edu) 😊
- Any challenges or ideas, please let us know





# Implementing Harmonization



# Implement SMART IRB Harmonized Guidance

- Review SMART IRB Guidances
  - Policy dependent:
    - Identify differences between local policies and SMART IRB guidance
    - Discuss changes with institutional stakeholders
    - Revise local and implement new, consistent policies
    - Educate research community on new policies
  - Procedurally dependent:
    - Try it, use the guidances, checklists, tools, and other resources
    - Never go back again...

A large teal arrow pointing to the right, serving as a background for the text.

Discussion/Questions



# Resources Recap and Frequently Asked Questions

**Polly Goodman, CIP**

Sr. Associate Director, SMART IRB

**Jeremy Lavigne, MA, CIP**

Sr. Officer, SMART IRB

# SMART IRB Resources

1413 Participating Institutions including all CTSA hubs

Reliance System: Log In >



Reliance Agreement ▾

Reliance System ▾

Harmonization

Resources & Education ▾

Support ▾

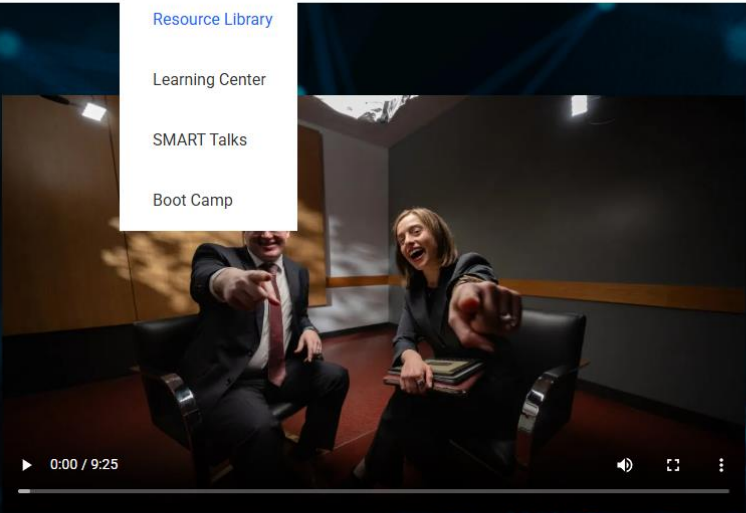


## SMART IRB

Supporting single IRB review and advancing collaborative research

Learn About Version 3.0 >

Steps to Join >



SMART IRB eases challenges associated with multisite research by providing free, comprehensive support for single IRB (sIRB) arrangements.

From small collaborations to large research networks, SMART IRB is designed to make multisite research work better for both IRB/HRPP personnel and research teams. Our educational resources, tools, templates, and guidance help Participating Institutions across the country improve efficiency, reduce burden, and advance research.

News and Events

# SMART IRB Resources

Resources cover a wide range of topics across sIRB, including key documents like:

- SOP
- Templates
- Guidance
- Checklists
- And more!



# SMART IRB Resource Implementation

## Remember:

- SMART IRB Resources are often customizable to fit *your* institution's needs
- Work with your leadership to determine *what* SMART IRB resource(s) will be used and *how*
- Consider meeting with other stakeholders as well (study teams, institutional officials, compliance monitoring teams) to ensure consistent understanding of materials



# Resource Evolution and Customization



**Purpose of Form:** If not using the SMART IRB Online Reliance System to coordinate and document study-specific reliance arrangements, institutions may use this template to document the Reviewing IRB and Relying Institutions for a study.

## Template Letter: Acknowledgement of Site Agreement to Cede IRB Review and Reviewing IRB to Provide Oversight

This form documents that:

- 1) [NAME OF REVIEWING IRB INSTITUTION] will serve as the Reviewing IRB for [NAME OF RELYING INSTITUTION] for the study noted below;
- and
- 2) [NAME OF RELYING INSTITUTION] has agreed to cede IRB review to [NAME OF REVIEWING IRB INSTITUTION] for the study noted below.

Study Title:	
Overall PI:	
Relying Site Investigator:	

IRB review will be ceded under the SMART IRB Master Common Reciprocal Institutional Review Board Authorization Agreement.

Questions about the IRB review process or study status should be directed to [POINT OF CONTACT EMAIL AND TELEPHONE].

cc: <Overall PI>  
<Relying Site Investigator>

[www.smartirb.org](http://www.smartirb.org)

SMART IRB encourages use and distribution of this content. If you extract any language, please cite SMART IRB as follows, "This information was obtained from [doc name] as part of SMART IRB, which is funded by the NIH National Center for Advancing Translational Sciences through its Clinical and Translational Science Awards Program, grant number 3UL1TR002541-01S1."

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



**Purpose of Form:** This form documents that the following Reviewing IRB Institution will serve as Reviewing IRB for the research noted below; and the following Relying Institution has agreed to cede IRB review to the Reviewing IRB listed below.

**Acknowledgement:** [NAME OF REVIEWING IRB INSTITUTION] will serve as the Reviewing IRB for [NAME OF RELYING INSTITUTION] for the study noted below; and [NAME OF RELYING INSTITUTION] has agreed to cede IRB review to [NAME OF REVIEWING IRB INSTITUTION] for the study noted below.

[NAME OF REVIEWING IRB INSTITUTION]	Location:
[NAME OF RELYING INSTITUTION]	Acronym:
[NAME OF RELYING INSTITUTION]	Study Title(s):
[NAME OF REVIEWING IRB INSTITUTION]	Exercising Institution:
[NAME OF REVIEWING IRB INSTITUTION]	Reviewing Institution PI/IRB#:
[NAME OF RELYING INSTITUTION]	Dr. F.
[NAME OF RELYING INSTITUTION]	Reviewing Institution Site PI/IRB#:
[NAME OF RELYING INSTITUTION]	Dr. J.

**Acknowledgment was**

[NAME OF REVIEWING IRB INSTITUTION]	[Signature]
[NAME OF RELYING INSTITUTION]	[Signature]

**Operating Procedures:** [NAME OF REVIEWING IRB INSTITUTION] and [NAME OF RELYING INSTITUTION] will follow the SMART IRB Master Common Reciprocal Institutional Review Board Authorization Agreement.

**Applies) HIPAA Determination:** [NAME OF REVIEWING IRB INSTITUTION] or a third party in connection with the research.

**Applies) HIPAA Authorization:** [NAME OF REVIEWING IRB INSTITUTION], the Relying Institution, the Relying Institution document(s), or the Relying Institution's authorization to ensure HIPAA compliance.

**Interest: Relying Institution**

**SMART IRB** SMART IRB encourages use and distribution of this content. If you extract any language, please cite SMART IRB as follows, "This information was obtained from [doc name] as part of SMART IRB, which is funded by the NIH National Center for Advancing Translational Sciences through its Clinical and Translational Science Awards Program, grant number 3UL1TR002541-01S1."



**Purpose of Form:** This form documents that the following Reviewing IRB Institution will serve as Reviewing IRB for the research noted below; and the following Relying Institution has agreed to cede IRB review to the Reviewing IRB listed below.

### Letter of Acknowledgement

IRB Review will be ceded under the [SMART IRB Agreement Version 3.0](#). Questions regarding this reliance arrangement should be directed to SMART IRB institutional [Points of Contact](#).

Reviewing IRB Institution	
Relying Institution	
Research Study Title(s):	
Reviewing Institution PI	
Relying Institution Site Investigator	
SMART IRB Terms	<input type="checkbox"/> Default Implementation Applies (per <a href="#">Implementation Checklist</a> ) <input type="checkbox"/> Flexible Implementation Applies (per <a href="#">Implementation Checklist</a> )
This Letter of Acknowledgment was completed by the following institutional representatives (Name, Role, Date):	
Reviewing Institution POC/Designee	
Relying Institution POC/Designee	

[www.smartirb.org](http://www.smartirb.org)  
Version date: 03/25

SMART IRB encourages use and distribution of this content. If you extract any language, please cite SMART IRB as follows, "This information was obtained from "Letter of Acknowledgment" as part of SMART IRB, which is funded in whole or in part with Federal funds from the National Center for Advancing Translational Sciences, National Institutes of Health, Department of Health and Human Services, under Contract No. 75N950C00008.

# Harmonization

Best practices on pressing sIRB topics from experts around the country

- Ancillary Reviews
- Conflict of Interest
- Continuing Review
- Reportable Events
- And More!

Soon: Local Considerations and Exemptions

The screenshot shows the SMART IRB website. The top navigation bar includes links for Reliance Agreement, Reliance System, Harmonization (active), Resources & Education, and Support. A search bar is on the right. The main header area has the title 'Harmonization' and the subtitle 'Strategic, efficient, and cooperative approaches'. A left sidebar contains a vertical menu with 'Guidance, Tools & Templates' (active), 'For Review and Comment', 'Steering Committee', and 'How We Work'. The main content area features a paragraph about inconsistent approaches to single IRB review and a section titled 'Guidance, Tools & Templates' with a search bar. Below this are three columns: 'Recommendations for the Harmonization of Ancillary Reviews', 'Conflict of Interest Review Processes', and 'Post-Approval Auditing', each with a brief description of its content.

SMART IRB

Reliance Agreement ▾ Reliance System ▾ Harmonization Resources & Education ▾ Support ▾

## Harmonization

Strategic, efficient, and cooperative approaches

Guidance, Tools & Templates

For Review and Comment

Steering Committee

How We Work

Inconsistent approaches to implementing single IRB review introduce new burdens and inefficiencies for investigators, collaborating institutions, and IRBs. SMART IRB seeks to harmonize approaches by promoting the alignment of policies and processes and the adoption of common forms, practices, and workflows.

### Guidance, Tools & Templates

Search documents by keywords

<b>Recommendations for the Harmonization of Ancillary Reviews</b>	<b>Conflict of Interest Review Processes</b>	<b>Post-Approval Auditing</b>
Best practices for defining ancillary reviews and recommendations for centralizing reviews, timing, and allocating responsibilities in an sIRB context. Includes guidance and an implementation checklist.	Addresses responsibilities of a Relying Institution and a Reviewing IRB/Reviewing IRB Institution in the COI review process, including FAQs and guidance for determining and managing COI.	Identifies best practices and provides tools to support for-cause and not-for-cause audits in an sIRB context. Includes guidance, checklists, and a template report.

# Learning Center and Start-Up Packages

LEARNING CENTER

For IRB & HRPP Administrators

Successfully manage single IRB arrangements



SMART IRB Start-Up Packages

Implementing the SMART IRB Agreement

Serving as a Reviewing IRB

Responsibilities of Relying Institutions

Reliance System Walkthrough

Resources for IRB and HRPP Personnel

Training for Investigators and Study Teams

## SMART IRB Start-Up Packages

Collected resources to help you understand and fulfill your roles and responsibilities in a single IRB arrangement. Each package includes a guide describing how and when to use the resources, as well as links to online tools and further information.

### Reviewing IRB Package

 [Download](#)

### Relying Institution Package

 [Download](#)

# SMART Talks

- Established in 2019, monthly forum for discussing pressing Single IRB Issues.
  - 1.5 hours per month
  - ~300-500 attendees
  - Recorded slides and video disseminated after discussion
- All SMART Talks and slides are available online at [www.smartirb.org](http://www.smartirb.org)



Reliance Agreement ▾

Reliance System ▾

Harmc 

[Community](#) [Contact Us](#)

# SMART IRB

Supporting single IRB review and advancing collaborative research

[Learn About Version 3.0 >](#)

[Steps to Join >](#)

[SMART IRB Support Center](#) > [Contact Us](#)

## Contact Us

Your email address \*

herbertwest@localu.edu

Full Name \*

Herbert West

Subject \*

Login

### Suggested articles

[Login Issues: I'm receiving an 'unauthorized' error message upon login.](#)

[Login Instructions: Which login options should I choose when I create my account?](#)

[Logging in to the Reliance System](#)

[Login Instructions: Creating a SMART IRB Account](#)

[Login Issues: I have an existing account from the previous Online Reliance System or Joinder System. Do I need to create a new SMART IRB account?](#)

[I'm having a technical issue in the Reliance System. Who should I reach out to for assistance?](#)

[How can I change/correct information on the Participating Institutions page?](#)

[Create an account to submit a request for reliance](#)

Description \*

Please enter the details of your request. A member of our support staff will respond as soon as possible.

SMART IRB eases challenges associated with multisite research by providing free, comprehensive

# SMART IRB Support Center

For all your questions related to:

- SMART IRB Agreement
- Reliance System
- Implementing sIRB
- General Single IRB Questions
- Best Practices for sIRB

<http://smartirb.org/support>

## The SMART IRB Agreement

SMART IRB Agreement v2.0: NIH Revisions to the SMART IRB Agreement

Background on SMART IRB Agreement v2.0

[Background: Why are the revisions to the SMART IRB Agreement reflected in SMART IRB Agreement v2.0 necessary?](#)

Background: How will SMART IRB Agreement v2.0 allow NIH to collaborate with extramural organizations?

Administrative Issues: If my institution has already joined SMART IRB Agreement v1.0, can my institution continue to use that Version 1.0?

Administrative Issues: My institution is not serving as a Reviewing IRB for the NIH nor is it ceding IRB review to the NIH Intramural Research Program IRB. Does my institution need to sign SMART IRB Agreement v2.0?

Administrative Issues: If my institution serves as a Reviewing IRB for the NIH engaged and for other institutions engaged in the Research, would all of the institutions engaged in that Research need to sign SMART IRB Agreement v2.0?

[See all 22 articles](#)

## SOPs

Is my institution required to use the SMART IRB SOPs?

What are the SMART IRB Standard Operating Procedures?

## Using SMART IRB for a Study

Can the SMART IRB Agreement be used for a study even if the Overall PI's home institution is NOT a SMART IRB Participating Institution?

What laws and regulations must the Reviewing IRB consider?

What constitutes a significant subject complaint that must be reported to the Reviewing IRB?

Who is responsible for addressing a subject's complaint?

If one of the Relying Institutions does not submit the necessary information for continuing review in advance of the expiration date, will all Relying Institutions be affected?

If the Reviewing IRB requests an audit of a study conducted at a Relying Institution, will the Relying Institution receive documentation that the audit was conducted, regardless of the result?

[See all 32 articles](#)

## Termination of Participation in SMART IRB

If an institution terminates participation in SMART IRB, are there any ongoing rights and obligations?



# Reach out to a SMART IRB Ambassador



Aaron Kirby  
*Harvard Catalyst*



Polly Goodman  
*Harvard Catalyst*



Jeremy Lavigne  
*Harvard Catalyst*



Ada Sue Selwitz  
*University of  
Kentucky*



Kathy Lawry  
*AAHRPP*



Nichelle Cobb  
*AAHRPP*



Stacey Goretzka  
*Independent  
Consultant*



Carissa Minder  
*Washington  
University in St. Louis*

Find your SMART IRB  
Ambassador Today:  
[www.smartirb.org](http://www.smartirb.org)



# SMART IRB Newsletter

6,000+ subscriber monthly email newsletter provides the sIRB community:

- SMART IRB Announcements,
- News,
- Resources, education
- And more!

Join today at [www.smartirb.org](http://www.smartirb.org)



## SMART IRB: The Essentials The "Fall, Leaves, Fall" Edition.

### All things being equinox.

#### Balancing apples with single IRB review.

Who's on first? Who's doing what? Reporting to federal agencies? Ensuring personnel training? Identifying COI? We've got it all mapped out in our **Institution v. IRB Responsibilities** guide for reviewing IRBs and relying institutions (thanks to the **Harmonization Steering Committee** for navigating the corn maze!).

### Take a hint.

#### Helpful tips for study teams, at your service.

Looking to get investigators and study staff up to speed on what it really means to rely on an external IRB? Send them our **FAQs for Research Teams**. Or, use our template to **customize the FAQs** to reflect your institution's extra special particularities. But wait, there's more to fall for at [smartirb.org/resources](http://smartirb.org/resources) - one-stop shopping for tools, templates, and checklists to help with single IRB review at prices you can't beat.

### Immediate gratification.

#### Data at your finger tips.

When your institution uses SMART IRB's **Online Reliance System** to document reliance arrangements, you can pull on-demand reports with information about all reliance requests involving your institution. Just **log in and click on the "Reports" tab**. Note: this feature is only available to an institution's Reliance POC and POC Backups. On-demand pumpkin letters downloaded separately.

### Class picture perfect.

(Awkwardly) smile if you're one of our Participating Institutions. **Take a look** at our big, beautiful, and ever-expanding reliance network! Be a pal and let us know if we have any apple crisp between our teeth.

### Fall fashion trend.

**Voted Vogue's #1 accessory for '18.**

Once you've joined, **sport a SMART IRB badge on your website.**



### Rolling admissions.

The time has never been better to **join SMART IRB**. Lend your affiliates a helping hand by sharing this **guidance**...and forward them the signature element of our press kit, the SMART IRB newsletter.

Study hall.



# Questions and Key Takeaways!



# Common SMART IRB Questions - Version 3.0

- Can Version 3.0 be used for any type of human subjects' research?
- I'm starting a new reliance arrangement. Do I *need* to use Version 3.0, or can I use legacy versions (e.g. V2.0, V1.0)?
- Who is in the driver's seat for relying site HIPAA-related items in V3.0?
- Does my institution need to sign the indemnification addendum to join V3.0?

# Common SMART IRB Questions- Reliance System

- **Login-** I can't login to the system and receive an 'unauthorized' message. What is this and what should I do?
- **Login-** How do I know if my institution is in InCommon or not?
- Who can **edit** a reliance request?
- What does 'Admin withdrawn' or 'Admin reliance reached' mean?
- Do I still need to 'batch' my reliance requests like in the old system?

# Common SMART IRB Questions - Resources

- **Letters of Acknowledgment:** Do they have to be signed, and if so, by who at my institution?
- Who completes the **Implementation Checklist** document?
- What is '**Default Implementation**' and what is '**Flexible Implementation**'?
- How do I know if the **SMART IRB SOPs** apply to a given study?
- Which version of the **Letter of Acknowledgment** should my institution use?

# Common SMART IRB Questions

- **Documenting Reliance:** Can I document reliance for multiple studies on one LOA? If so, how?
- Who completes the Implementation Checklist document?
- What is 'Default Implementation' and what is 'Flexible Implementation'?
- How do I know if the SMART IRB SOPs apply to a given study?
- Which version of the Letter of Acknowledgment should my institution use?