Meeting Objectives

Overview
Gain a basic understanding of what reliance is

Eligibility
Learn about what constitutes as eligible for reliance

Execution & Responsibilities
Set-up Instructions / Lead site vs. Participating site responsibilities
01
Reliance Overview
What is reliance and why do I need it?
### Why do I need reliance?

<table>
<thead>
<tr>
<th><strong>NIHs IRB Policy</strong></th>
<th><strong>Revised Common Rule</strong></th>
<th><strong>Reduce Burden</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>January 25, 2018</td>
<td>January 20, 2020</td>
<td>Always been the practice of choice</td>
</tr>
<tr>
<td>NIH funded multi-site studies involving non-exempt human subjects research</td>
<td>“Cooperative Research” – more than one institution</td>
<td>Reduces duplication of efforts and administrative burden</td>
</tr>
<tr>
<td>“Same protocol” – same research questions, involving same methodologies and outcomes</td>
<td>Any US site engages in cooperative research that is subject to the Common Rule</td>
<td></td>
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<td></td>
<td>45 CFR 46.114</td>
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</table>
As a researcher, where should I start?

You probably have multiple roles that relate to your research (academically, professionally, personally)

The Multiple “Hats” That Researchers Wear

- Harvard hat
- Hospital hat
- Home institution hat
- Volunteer hat
- Consultant hat
- Unicorn hat
Despite the many “hats” you’re wearing, ask yourself…

1. Is the research you’re conducting in fulfillment of a Harvard-related course, degree program, and/or academic requirement (e.g. capstone, thesis, dissertation, practicum, etc)?

2. Are you representing yourself as a Harvard-affiliate while conducting the research?

If **YES**, you are wearing your Harvard “hat”; Harvard IRB review is required.

If **NO**, you are not wearing your Harvard “hat”; Harvard IRB review is not required.

*When in doubt, check in with the IRB*

Additional information on this topic can be found on HLC IRB Tip Sheets: Agent of Harvard & Dual Affiliation.
But wait…it doesn’t stop there!

Regardless of if you are/are not wearing your Harvard “hat” — IRB review at the institutions where you wear other “hats” may still be required.

You must check in with every institution you are affiliated with to ensure their IRB requirements are met.

What if I need more than one IRB review?

In some instances, where multiple IRBs are involved in a research project, IRBs can agree to “rely” on one single IRB for review. This is common when:

• The research project is ongoing and is led by a non-Harvard PI
• You will be, or have been, added as a study team member to that project

Harvard is willing to consider reliance agreements with other institutions if:

• The institution is within the US
• The research is non-Exempt
• The reliance agreement meets Harvard’s criteria

More information can be found here: ORARC Reliance Support webpage
Reliance is Multidimensional

- Each with individual needs:
  - Pre-submission
  - IRB System
  - Organizational Policies
  - Additional Paperwork / SMARTIRB (IAA, ICF, etc.)
Reliance can feel intimidating…

Don’t worry, we are here to help!
Reliance Eligibility
Let’s talk about human subjects' research…

For reliance to take place we need to ensure we are engaged in non-exempt, human subjects research.
Types of IRB Review

1. Not Research
   Activities do not meet the regulatory definition of “research”

2. Not Human Subjects Research
   Activities do not meet the regulatory definition of research involving “human subjects”

3. Exempt
   Research activities involving human subjects that fall into one of the eight categories

4. Expedited
   Research activities involving human subjects that involve no more than minimal risk

5. Reliance Eligible

6. Convened IRB
   Research involving human subjects that does not qualify for Exempt or Expedited review, typically involving greater than minimal risk to subjects.
Reliance
Execution
Three Essential Elements

1. IRB approval notice
   (lead site)

2. IRB Authorization Agreement or IAA
   (typically SMART IRB)

3. Institutional Authorization
   (home site)
Three Essential Elements

1. IRB approval notice (lead site)
2. IRB Authorization Agreement or IAA (typically SMART IRB)
3. Institutional Authorization (home site)

1. Obtain IRB approval from:
   ____________________________

2. Obtain IAA
   - SMART IRB# _____
   - OR -
   - Traditional Form

3. Finalize ESTR app
   - ESTR# ___ - ______

*Please note that steps 2 and 3 can be worked on simultaneously, but step 3 cannot be finalized without step 2 completion*
Harvard Serves as Lead IRB (aka Reviewing IRB, IRB of Record)

1. Harvard Site Team
   - Identify how sites will be involved

2. Harvard Site Team
   - Make sure ESTR app indicates reliance

3. Harvard Site Team
   - Begin either SMART IRB or IAA process

4. Reliance Coordinator
   - Finalize IAA after all sites have completed their portion

5. Reliance Coordinator
   - IAA is attached in ESTR and reliance is confirmed

6. Harvard Site Team
   - Provide notice to sites and add them in ESTR
Harvard Serves as Lead IRB (ESTRapp)

**Step 2**

Visit a main study workspace (in any state), where it is indicated on the Basic Information page of the SmartForm that BOTH:

This is a **collaborative or multisite study**

AND

Harvard will act as the **IRB of record** for **any project**

**ESTR Example**

4. *What kind of study is this?*
   Multi-site or Collaborative study
   Choose 'multi-site or collaborative' where there is more than one site conducting the study, if there is possible collaboration with non-Harvard researchers, or if it is unclear if there will be additional sites.

5. *Will an external IRB act as the IRB of record for this study?*
   - Yes
   - No

6. *Will your IRB act as the single IRB of record for other participating sites?*
   - Yes
   - No

Choose 'yes' if there is possible reliance on Harvard review or if reliance is unclear at this time. You will be asked to add and manage site information for this submission via additional activity.
Harvard Serves as Lead IRB (Begin IAA process)

Step 3

If both sites are utilizing the SMART IRB platform then an IAA can be initiated through that process

OR

IAA process can occur independently outside of SMART IRB system and an IAA document will be produced separately

SMART IRB Example

https://smartirb.org/reliance/

3. Harvard Site Team

• Begin either SMART IRB or IAA process
Harvard Serves as Lead IRB (Reliance Coordinator)

Steps 4 & 5

Reliance Coordinator finalizes IAA in SMART IRB and in ESTR
Harvard Serves as Lead IRB (Begin IAAProcess)

Step 6
Each participating site needs to be added in to ESTR

Reliance has not been achieved until receipt that site has been added has been confirmed
Harvard is a Participating Site (aka Relying Site, pSite)

1. Lead Site Team
   - Works together with Harvard to determine what study activities are occurring at this site

2. Harvard Site Team
   - Make sure ESTR app indicates collaboration (include IRB approval letter from lead site)

3. Harvard Site Team
   - Work with Lead Site to complete IAA either through SMART IRB or via individual agreement.

4. Reliance Coordinator
   - Finalize IAA after all sites have completed their portion.

5. Reliance Coordinator
   - IAA is attached in ESTR, reliance is confirmed, and a letter is issued.
Harvard is a Participating Site (ESTRapp)

Step 2
Visit a main study workspace (in any state), where it is indicated on the Basic Information page of the SmartForm that BOTH:

- This is a **collaborative or multisite study**
- **Harvard will act as the IRB of record** for any project

It will also be important to fill in the Basic Local Site and External IRB information.
Harvard is a Participating Site

(Begin IAA process)

Step 3

If both sites are utilizing the SMART IRB platform then an IAA can be initiated through that process

OR

IAA process can occur independently outside of SMART IRB system and an IAA document will be produced separately

SMART IRB Example

https://smartirb.org/reliance/
Harvard is a Participating Site (Reliance Coordinator)

Step 4
Reliance Coordinator finalizes IAA in SMART IRB or through other methods.

Determination Letter
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Last Updated by Laura Ko on August 10, 2020 at 4:15 PM UTC

Overall Principal Investigator:
The Reviewing IRB has selected the SMART IRB Agreement, Agreed 30% for this study. This decision applies only to the determination of IRB reliance, and does not reflect IRB approval of the research project itself. Approval for each relying site must be obtained from the Reviewing IRB (the IRB accepting the reliance of another) prior to initiating study activity at each site.

If you have any questions, contact the Reviewing IRB to determine further required action.

Reliance Determination:
Overall Principal Investigator:

The Reviewing IRB at Partners HealthCare System, Inc.

Federal Wide Assurance (FWA): #000000003
SMART IRB Agreement Version: Agile v1
Point of Contact: Madeleine S. Mundry, mdunry@partners.org

Reviewing IRB accepts review for:

Harvard Medical School (HMS) and Harvard School of Dental Medicine (HSDM)

Federal Wide Assurance (FWA): #000000003
SMART IRB Agreement Version: Agile v1
Site Investigator:

Harvard University

Federal Wide Assurance (FWA): #000000003
SMART IRB Agreement Version: Agile v1
Site Investigator:

MGH Institute of Health Professions

Federal Wide Assurance (FWA): #000000003
SMART IRB Agreement Version: Agile v1
Site Investigator:

Responsibilities:
The following information summarizes the responsibilities of the Overall Principal Investigator (PI) and the Site Investigators (SI).

Responsibilities of Overall PI:

1. Provide Site Investigators with:
   - Copies of all IRB approval documents
   - Current approved versions of study documents, such as protocol, consent and authorization forms, recruitment materials, etc.
   - Notifications of all modifications, amendments, or changes to the protocol
   - Notification of any suspension or termination of protocol approval

Responsibilities of Site Investigators:

1. Comply with protocol, amendments, and recruitment procedures as applicable and approved by the Reviewing IRB
2. Obtain informed consent as specified by Reviewing IRB, as applicable
3. Submit to Overall PI any:
   - Unanticipated problems involving risk to subjects
   - Major deviations
   - Reports of noncompliance
4. In the event of a suspension or termination, stop research activity as instructed by Overall PI
5. In the event of an audit, allow the Overall PI and designees from the Reviewing IRB access to research-related data

Additional Comments: Partners protocol 2013P001746

Please direct questions regarding the determination or your responsibilities as an Overall PI or SI to the Partners HealthCare System, Inc. Point of Contact: Maria Sanquineti, msanquineti@partners.org.

Thank you.

4. Reliance Coordinator
• Finalize IAA after all sites have completed their portion
Harvard is a Participating Site (Reliance Coordinator)

Step 5
Reliance Coordinator will send a letter from the ESTR system confirming the reliance process. It will note the institution providing oversight.

ESTR Letter Example

5. Reliance Coordinator
   • IAA is attached in ESTR and reliance is confirmed
Lead Site Responsibilities

The lead site is responsible for providing IRB review of the study just as they would be independent of reliance – but for ALL sites

While the lead site is ultimately “in charge”, the participating site is not without monitoring responsibilities

Participating Site Responsibilities

HRPP at participating sites will be responsible for meeting all of its current related responsibilities described in the HHS regulations (45 CFR 46)

- reviewing conflicts of interest
- radiation safety
- ensuring that site investigators obtain informed consent from prospective research participants
- ensuring that site investigators meet local training requirements
- overseeing the implementation of the approved protocol
- reporting local unanticipated problems involving risks to subjects or others, and study progress to the single IRB.
What are the PI responsibilities?

**Lead Site PI**
- Appendix D (Investigators Manual)

**Relying Site PI**
- Appendix E (Investigators Manual)
References & Resources


Questions
Thanks!

Do you have any questions?
jchamberlin@hsph.harvard.edu