What You Need to Know When Relying on BRANY IRB

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For Burke Neurological Research Institute
January 25, 2019

BRANY

Roadmap

- Useful Information
- IRBManager Basics
- Informed Consent
- Reportable Events
- QA Audits and Regulatory Documents

Useful Information

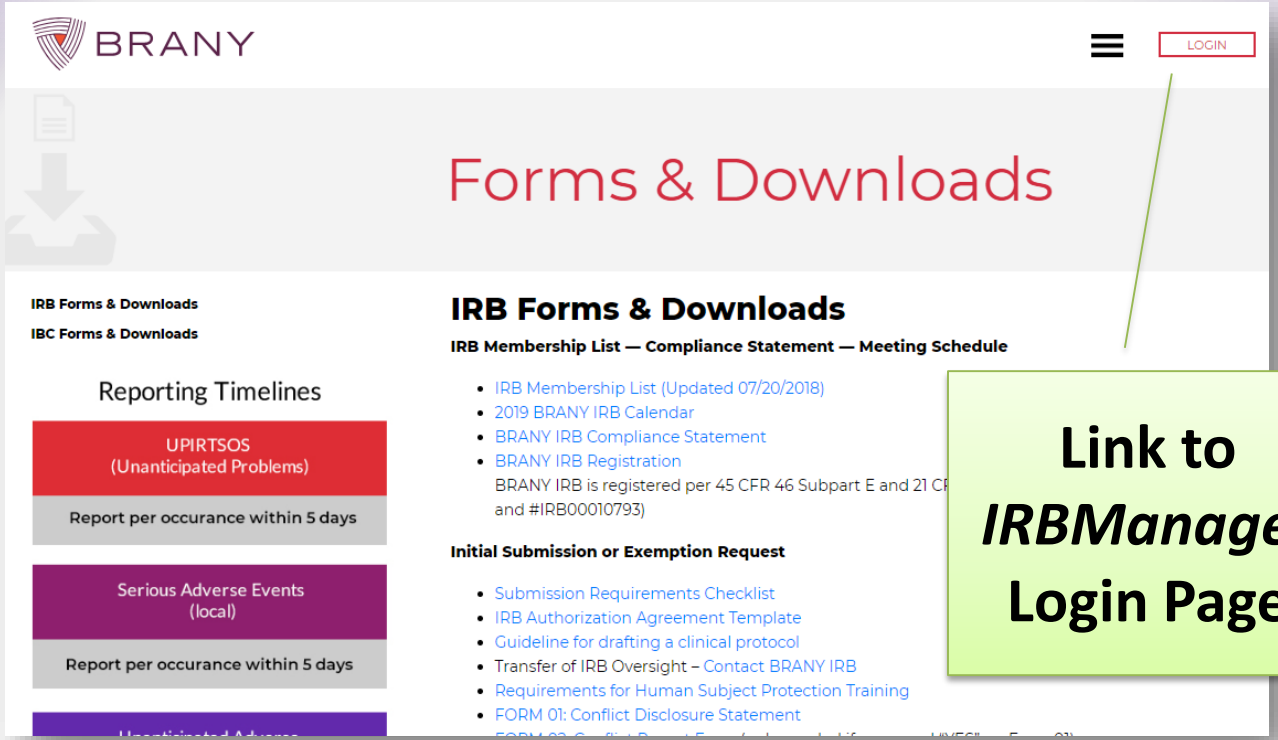
Always available in the left menu in IRBManager.

- *IRBManager* **Useful Links**
  - BRANY IRB Website
  - User Access Form
- Monthly IRBManager & xForm Basics webinar
  - Live or on demand

BRANY

Useful Information

www.branyirb.com



Link to *IRBManager* Login Page

- IRB Roster
- Submission guidance
- Consent/Assent templates
- COI forms
- IRB staff contact info
- Reporting Timelines

User Access Form (UAF)

One time form, grants *IRBManager* login rights only!

IRBManager password xForm = paper/wet signature

Required for *ALL* who are part of study submission process:

- PI: authorize xForm submission (*IRBManager* password = signature)
- Research Coordinator (Primary): view/submit
- Others: view/submit (e.g., regulatory coordinator, admin personnel)
  - Listed as site contacts in *IRBManager*

IRBManager role used to send study email alerts.

- ***Does NOT necessarily equate to an individual's function in the study!***

IRBManager Account Credentials

Forgot Password?

- Click link on login screen to reset.
- Note: copy/paste of temporary password usually copies an extra trailing space.

How to Access *IRBManager*

Login URL: https://brany.my.irbmanager.com

- Bookmark Web address
- Enable Pop-ups for https://brany.my.irbmanager.com

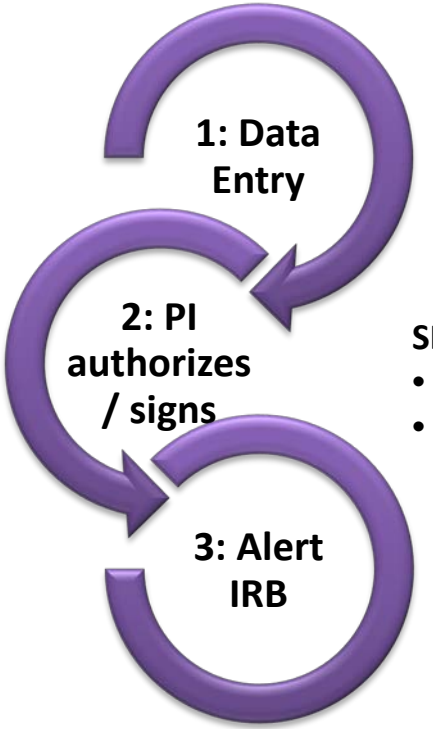
Platforms:

- Apple/Macintosh or PCs
- Web browsers: Firefox, Safari, Chrome, Internet Explorer

Smart Devices

- Android, iPhone, iPad
- xForms = accessible via Smart Devices
  (helpful when PI is out of office xForms need PI password)
- View attachments: need app for viewing PDFs or Word files

xForm Submission Process



DATA ENTRY

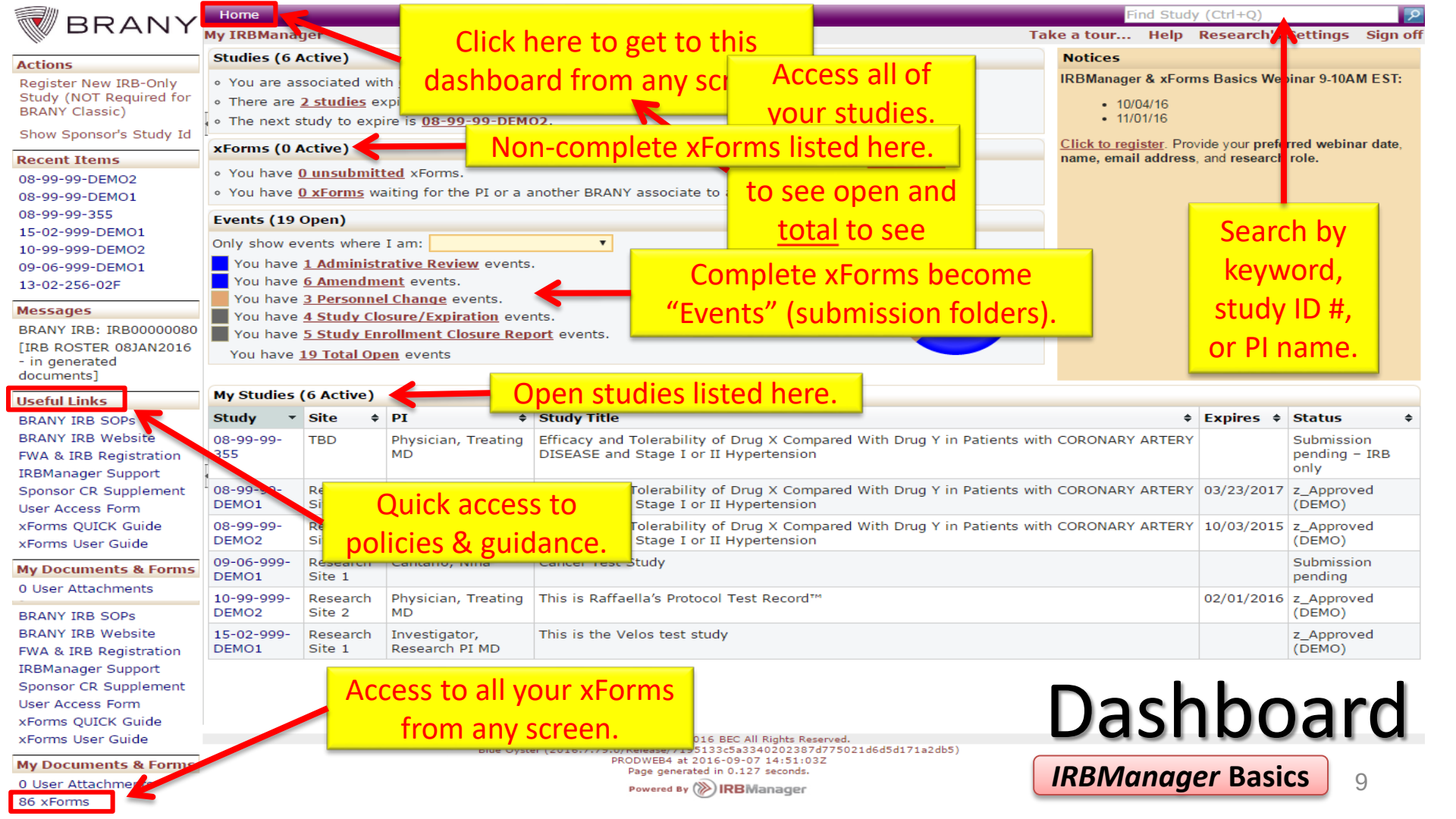
- xForm submitted by site
- xForm can still be modified by you!

SIGNATURES REQUIRED

- PI Notify and Signature OR
- Data Entry Stage with Signatures Required

ALERT IRB

- Accepted >> forwarded for processing
- Rejected >>
  - Back to Stage 1 for modification
  - Re-submit, PI required to ***re-authorize***


BRANY
Home
Find Study (Ctrl+Q)
My IRBManager
Take a tour... Help Research Settings Sign off
Actions
Register New IRB-Only Study (NOT Required for BRANY Classic)
Show Sponsor's Study Id
Recent Items
08-99-99-DEMO2
08-99-99-DEMO1
08-99-99-355
15-02-999-DEMO1
10-99-999-DEMO2
09-06-999-DEMO1
13-02-256-02F
Messages
BRANY IRB: IRB00000080 [IRB ROSTER 08JAN2016 - in generated documents]
Useful Links
BRANY IRB SOPs
BRANY IRB Website
FWA & IRB Registration
IRBManager Support
Sponsor CR Supplement
User Access Form
xForms QUICK Guide
xForms User Guide
My Documents & Forms
0 User Attachments
BRANY IRB SOPs
BRANY IRB Website
FWA & IRB Registration
IRBManager Support
Sponsor CR Supplement
User Access Form
xForms QUICK Guide
xForms User Guide
My Documents & Forms
0 User Attachments
86 xForms
Studies (6 Active)
You are associated with
There are 2 studies expi
The next study to expire is 08-99-99-DEMO2.
xForms (0 Active)
You have 0 unsubmitted xForms.
You have 0 xForms waiting for the PI or a another BRANY associate to
Events (19 Open)
Only show events where I am:
You have 1 Administrative Review events.
You have 6 Amendment events.
You have 3 Personnel Change events.
You have 4 Study Closure/Expiration events.
You have 5 Study Enrollment Closure Report events.
You have 19 Total Open events
Notices
IRBManager & xForms Basics Webinar 9-10AM EST:
10/04/16
11/01/16
Click to register. Provide your preferred webinar date, name, email address, and research role.
My Studies (6 Active)
Study
Site
PI
Study Title
Expires
Status
08-99-99-355
TBD
Physician, Treating MD
Efficacy and Tolerability of Drug X Compared With Drug Y in Patients with CORONARY ARTERY DISEASE and Stage I or II Hypertension
Submission pending – IRB only
08-99-99-DEMO1
Tolerability of Drug X Compared With Drug Y in Patients with CORONARY ARTERY Stage I or II Hypertension
03/23/2017
z_Approved (DEMO)
08-99-99-DEMO2
Tolerability of Drug X Compared With Drug Y in Patients with CORONARY ARTERY Stage I or II Hypertension
10/03/2015
z_Approved (DEMO)
09-06-999-DEMO1
Site 1
Cancer Test Study
Submission pending
10-99-999-DEMO2
Research Site 2
Physician, Treating MD
This is Raffaella's Protocol Test Record™
02/01/2016
z_Approved (DEMO)
15-02-999-DEMO1
Research Site 1
Investigator, Research PI MD
This is the Velos test study
z_Approved (DEMO)
Click here to get to this dashboard from any scr
Access all of your studies.
Non-complete xForms listed here.
to see open and total to see
Complete xForms become "Events" (submission folders).
Search by keyword, study ID #, or PI name.
Open studies listed here.
Quick access to policies & guidance.
Access to all your xForms from any screen.
016 BEC All Rights Reserved.
PRODWEB4 at 2016-09-07 14:51:03Z
Page generated in 0.127 seconds.
Powered By IRBManager

Dashboard

To Start a New Research Study

1. Obtain *IRBManager* User Account
2. Click **START NEW STUDY** under BRANY logo.

Answer form questions like this:

a) A NEW STUDY = **YES**
b) BRANY Relationship Manager = **NO**
c) IS THE NEW STUDY A MULTISITE STUDY…= **NO**

To Start a New Research Study

Click on **REGISTER NEW STUDY** at bottom of page.

New form will open – complete & submit.

a) Attach protocol & consent documents

b) Attach PI's signed & dated CV, & current clinical license (if applicable)

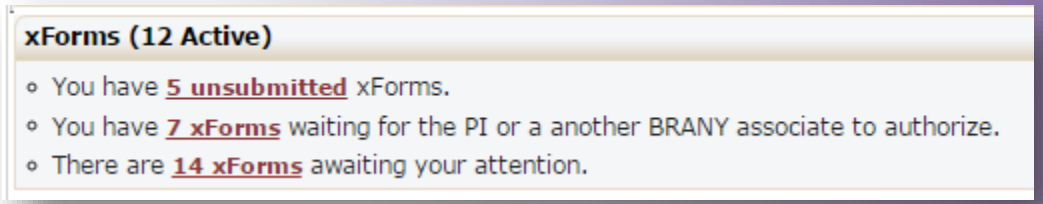
This will enter your study into *IRBManager.*

BRANY IRB will provide a BRANY IRB file number & instructions.

3. Complete & submit **RESEARCH APPLICATION** xForm.

Takeaways for *IRBManager*

- ***Home page***
  - ✓ Dashboard xForm section



- ***xForms you started?***
  - ✓ Bottom left: ***My Documents and Forms*** - click ***# xForms***

- ***xForms you need to authorize (PIs especially)***
  - ✓ Click **Home**: ***There are # xForms awaiting your attention***

- BRANY IRB website: http://www.branyirb.com
- *IRBManager* login: https://brany.my.irbmanager.com

Questions so far?

Let’s discuss Informed Consent next…

Informed Consent – Not Just a Form

- **Process** – not just a signature on the form
- Provide adequate information
- Allow for an informed decision
- Facilitate understanding
- Continuous communication

Time to ask questions

Discuss with family & friends

Obtain voluntary agreement

Continue to provide information as the study progresses or as the subject or situation requires

Reference: https://www.fda.gov/ForPatients/ClinicalTrials/InformedConsent/default.htm

Informed Decision

Participants need to be informed about:

- what will be done to them
- how the protocol (plan of research) works
- what risks or discomforts they may experience
- participation being a voluntary decision on their part

Reference: https://www.fda.gov/ForPatients/ClinicalTrials/InformedConsent/default.htm

Effective Informed Consent Process

- Provide sufficient opportunity for the participant to consider whether to participate.
- Exchange of information between participant and investigator
- Discuss the contents of the informed consent document
- Circumstances that minimize the possibility of coercion or undue influence
- Appropriate documentation of consent process and documents

Reference: https://www.fda.gov/ForPatients/ClinicalTrials/InformedConsent/default.htm

Sample Enrollment Note

- Date / Protocol ID / Subject ID
- Subject A-B has been enrolled in the Sponsor name/study. The study was explained, the subject was given a copy of the consent and an opportunity to ask questions. A signed copy was given to the subject. Consent was obtained prior to the performance of any study procedures.
- (For women of child bearing potential) The procedures listed in the consent with regard to pregnancy were reviewed with the subject. The subject agreed to continue abstinence or a medically accepted method of birth control as defined in the consent for the entire study. The subject was informed to notify the study doctor immediately if she suspects she has become pregnant.

Sample Enrollment Note

- The subject meets all inclusion criteria and does not meet any exclusion criteria. A laboratory specimen for screening was drawn and shipped to Lab name as per protocol.
- Physical exam by Dr. X.
- Relevant Past Medical History
- Current medications: include name, dose, frequency, indication and date started.
- Next study visit is date and time.
- Sign and date

Informed Consent Forms

BRANY IRB will stamp your approved consents

- Only use copies of stamped & approved forms
- Use most current version (Version A, B, C)
- Approval letter specifies requirement for re-consent
- Keep copies of signed consent forms
- IRB will ask you to supply copies of last 2 consent forms signed by participants at the time of continuing review

When Children are Subjects…

BRANY IRB Assent Guidelines

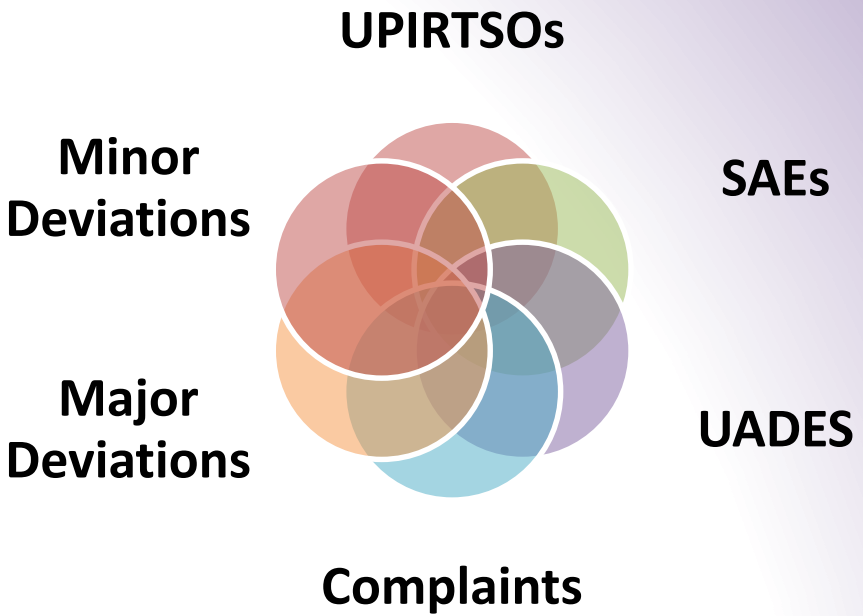
- Ages 6 and under: documented assent not typically required
- Ages 7-12: document via simplified assent form
- Ages 13-17: assent signature on parent consent
- Witness to assent process required

BRANY IRB's Consent/Assent Templates

- https://www.brany.com/forms-and-downloads/
- New elements required by Revised Common Rule
  - Concise & focused summary of key information
  - Possible future use of identifiable private information or identifiable biospecimens (even if de-identified 1st)?
  - Will biospecimens be used for commercial profit and will subjects share in this commercial profit?
  - Will clinically relevant results be returned to subjects, and if so under what conditions?
  - Will the research involve whole genome sequencing?

Questions?

Let’s discuss Reportable Events next…



Reportable Events

The Principal Investigator must ensure problems are reported to the IRB.

Reporting Timelines

Unanticipated Problems (UPIRTSOs)	• Report per occurrence within 5 days (xForm #16)
Serious Adverse Events (local)	• Report per occurrence within 5 days (xForm #16)
Unanticipated Adverse Device Effects (UADEs)	• Report per occurrence within 10 days (xForm #16)
Complaints	• Report per occurrence within 5 days (xForm #16)
Major Deviations	• Report per occurrence within 10 days (xForm #16)
Minor Deviations	• Report in aggregate with Continuing Review or Study Closure (Minor deviation log)

What is an Unanticipated Problem?

Unanticipated Problems Involving Risks to Subjects or Others (UPIRTSO)

Any event that:

1. is **unexpected**
2. suggests that subjects or others are at **greater risk than was previously known or recognized**, and
3. is **related** to the research procedures

What's in a Name?

Unanticipated problem involving risks to subjects or others

- adverse event
- protocol deviation
- other types of incidents (not AEs)
- social, psychological, financial harms
- or….no harms occurs (risk)

BRANY IRB's **Reportable Event xForm** (#16) prompts you to consider the 3 UPIRTSO criteria for all reportable event submissions

How to Assess Unexpected?

Either:

- Not consistent with known risks or adverse events associated with procedures, IB, IC

OR

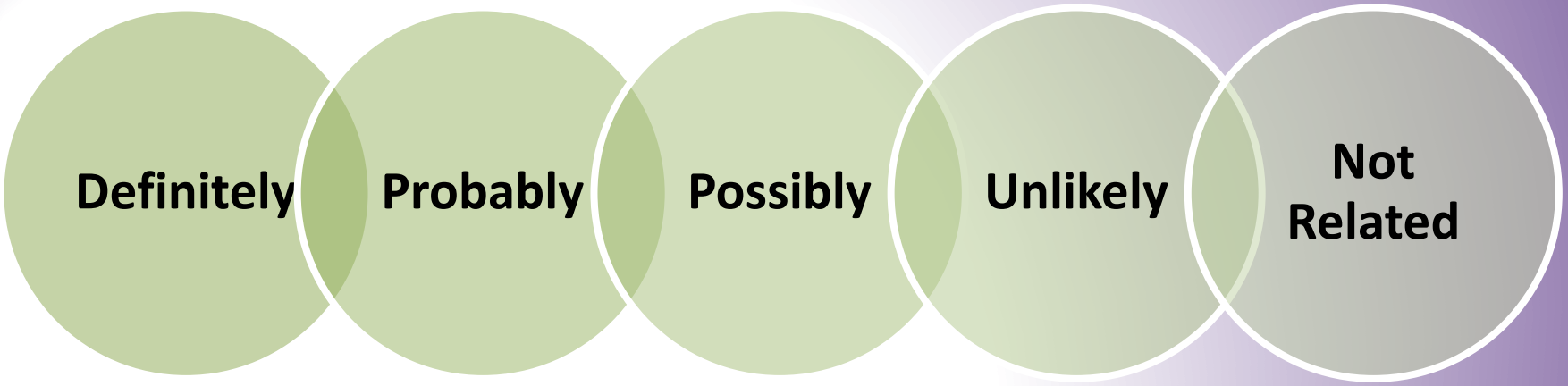
- Not consistent with the natural progression of any underlying condition and predisposing risk factors.

Judgment of Causality

1) Correlation strength
2) Dose-response
3) Temporal relationship
4) Biological mechanism
5) Previous study agreement

References: US PHS. (1964). Smoking & Health, Report of Advisory Committee to Surgeon General Hill, AB. (1965). Environment & Disease: association or causation?

Continuum of Relatedness



- Related or Possibly Related means…..

  There is a reasonable possibility that the outcome may have been caused by procedures involved in the research.

How to Assess Relationship?

AEs can be caused by:

- Research procedures
- Underlying disease, disorder, condition
- Other circumstances, unrelated to 1 or 2 above

How to Assess Greater Risk?

- Does the event suggest that the research places subjects or others at ***greater risk of physical or psychological harm than previously known or recognized***?
  - If **unexpected**, **related**, and **serious**, answer is always **YES**.

Protocol Deviations

Things Happen…

- All changes to the IRB-approved protocol require prior IRB approval
- BUT…sometimes unavoidable circumstances result in deviations

Definition

- **Any temporary alteration/modification to the IRB-approved protocol.**
- The protocol may include the detailed protocol, protocol summary, consent form, recruitment materials, questionnaires, IRB application, and any other information relating to the research study.

Major vs. Minor Deviations

- Affects subject safety, rights, welfare, or integrity of study data?

Yes = Major	No = Minor

Reportable Events

MAJOR	MINOR
Failure to obtain informed consent • no documentation • consent obtained after study procedures initiated	Inappropriate consent documentation • Copy not given to subject • Someone other than the subject dated the consent form
Enrolling subject who does not meet inclusion criteria or that met exclusion criteria	Deviations from the approved study procedure that do not affect subject safety or data integrity
Use of study procedures not approved by the IRB	Study procedure conducted out of sequence
Failure to report Reportable Events to the IRB and/or sponsor	Omitting an approved portion of the protocol

Protocol Exceptions

- A deviation that has been submitted to the IRB for review, and has been approved by the IRB prior to initiation.

(Sometimes referred to as “protocol waivers”)

- Submit to IRB using Reportable Event xForm (#16)

Questions?

Let’s discuss Quality Assurance & Regulatory Documents next…

BRANY

BRANY Quality Assurance

- BRANY's QA department will audit research studies for compliance with:
  - Applicable regulations
  - BRANY IRB policy
  - IRB approval requirements
  - FDA's Good Clinical Practice (GCP) guidelines.
- Detailed audit reports provided to:
  - Investigator
  - Institution
  - BRANY IRB

BRANY QA Reviews

- New PI
- Deviations
- Adverse Events
- High Enrollments
- Vulnerable Populations
- Activity / Complexity / Risk

Common Deficiencies

Delegation Log

Signatures / Dates (consents/source docs)

Visit windows

Timely Re-consent

Regulatory Docs (IRB approvals, labs)

IRB Submission Timelines (reportable events)

Protocol Exceptions ("Waivers") not approved by IRB

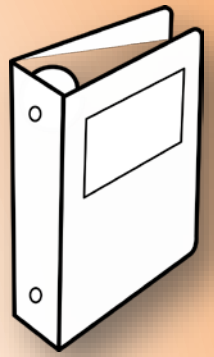
Major Deficiencies

- Inclusion / Exclusion
- Consent: most current version, translations
- Medication Errors / Appropriate Delegation

Reference: FDA (2009). Investigator Responsibilities- Protecting Rights, Safety, and Welfare of Study Subjects.

STUDY DOCUMENTATION

- Maintain adequate records of study activities
- Ability to re-construct all study activities
  - For each subject
  - For each study procedure performed



Maintain a Regulatory Binder!

IF IT IS NOT DOCUMENTED, IT WAS NOT DONE!

IRB Approval Notices

- Documents in chronological order by approval date
- Copies of IRB approvals for:
  - Consent / assent forms (and translations, if applicable)
  - Protocols
  - Amendments
  - Documents for any medical devices or drugs used in the study
    - Investigator's Brochure or package inserts (drugs)
    - Instructions for Use or device manuals (devices)
  - Subject materials (e.g., Diaries, Surveys, Questionnaires, Interview guides)
  - Recruitment materials
  - Study personnel

Study Personnel

- For PI & key personnel, maintain copies of:
  - Current clinical license
  - CV (signed and dated within 1 year)
  - Financial disclosures (if required by sponsor)
  - BRANY IRB Conflict of Interest Disclosure forms
  - Human subject protections training
  - Good Clinical Practice (GCP) training
  - IATA (International Air Transport Association) training for transporting infectious & diagnostic substances

Key personnel: individuals who are responsible for the design and conduct of a study.

Laboratory Documents

- Lab Director Information
  - License (non-expired)
  - CV (signed and dated within 1 year)
- CAP (College of American Pathologist) Certificate
- CLIA (Clinical Laboratory Improvement Amendments) Certificate
- Certificate from State Department of Health (DOH)
- Reference Ranges

Other Study Documentation

- **SCREENING & ENROLLMENT LOGS**
- **INVESTIGATIONAL PRODUCT ACCOUNTABILITY LOG**
- **DEVIATIONS**
  - Reports to IRB (& Sponsor if applicable)
  - “Waivers” or “exceptions” = planned deviations & need prospective IRB approval
- **SUBJECT SOURCE DOCUMENTATION**
  - Consent forms, HIPAA authorization forms
  - Enrollment notes
  - Documentation that subject met eligibility criteria (inclusion/exclusion)
  - Documentation of protocol procedures for study visits

Questions?

Thank you!

BRANY