

# How to Submit Prospective and Retrospective Studies to the IRB

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# Slides Summary / Table of Contents

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## What is the IRB?

An **Institutional Review Board** (**IRB**), is a committee that has been formally designated to approve, monitor, and review biomedical and behavioral **research** involving **human subjects**.

- #1 Priority: Protect subjects from physical, psychological, or status/financial harm
  - Even retrospective chart reviews carry risks: invasion of privacy; confidentiality breach
- #2 Priority: Protect Temple's research program
  - Federal penalties, less funding, damage to Temple's image



# Human subjects research (HSR)

• A systematic investigation—designed to develop/contribute to generalizable knowledge—involving living individuals about whom an investigator conducting research obtains: 1. <u>Identifiable private information</u> or 2. Data through <u>intervention or interaction</u> with the individual.

 If a project is Human Subjects Research, it must be reviewed/approved by the IRB.



# So your protocol is Human Subjects Research...

What's Next?



# Submit to the IRB to be reviewed as follows...

- Exempt: A designated reviewer determines that the research is exempt from certain rules and regulations.
  - The IRB <u>must</u> review the initial protocol and modifications that may change the category.
  - Use the Minimal Risk protocol and consent templates.
- Expedited: A designated reviewer approves the research initially, annually (in some cases), and any modifications.
  - Does not mean faster.
  - Use the Minimal Risk protocol and consent templates.
- Full Board: A fully convened IRB committee reviews the research initially, annually (at minimum), and any modifications.
  - For research that doesn't fit into the above categories or is greater than minimal risk.
  - Use the Main protocol and informed consent templates.

# Exempt, Expedited, and Full Board...

- Cannot begin before the IRB approves the research.
- The IRB will stamp the consent form(s), and those are the ones that should be used.
  - Stamped consents can be found in the Attachments tab for every approved submission in which a consent was submitted.
- Changes to the study (recruitment methods, data collection/storage, N, tasks, personnel, etc.) should be submitted as Modifications.
- Problems (over-enrollment, unsigned consent, protocol deviation, confidentiality breach, adverse event, etc.) need to be reported to the IRB.



# Exempt 4: Retrospective vs prospective chart reviews

- Retrospective = exists at the time that the IRB receives the submission.
  - Waiver of consent and HIPAA authorization is fairly simple.
  - Use the IRB's Chart Review Protocol Template.
- Prospective = exists after the time that the IRB receives the submission.
  - Waiver of consent or HIPAA authorization may not be granted.
  - Collecting patient follow-up data that extends beyond the date of submission introduces a prospective element to the study.
  - The Chart Review Protocol Template may still apply, but if waivers of consent and HIPAA aren't sought / granted, the Minimal Risk Protocol Template is preferred.



# Prospective studies that are not chart reviews

- Minimal Risk studies
  - Examples include blood draws, MRI, some behavioral interventions
- Greater than Minimal Risk studies
  - Examples include drug/device trials, experimental surgeries, surveys / interviews of incriminating behavior
- Randomized trial of two SOC procedures / drugs
  - Can still be greater than minimal risk



# A couple of notes...



# **Funding matters**

- Federally-funded studies:
  - May require Single IRB.
  - Require additional language in the consent.
  - Consult with the IRB prior to submitting the protocol (and grant if multi-site).
- Industry-initiated studies:
  - Must be reviewed by WIRB, but will be submitted to the Temple IRB prior to WIRB review.
  - Must include the WIRB Initial Submission Form in the submission to the Temple IRB.



## Know who can be the PI!

- Only fulltime faculty members can be the PI, unless a special PI Exception form is signed by your dean and the Vice President for Research (Michele Masucci).
- If you are not fulltime faculty and don't have that form, make sure you are not listed as the PI.
  - Even if the study is your idea, and you're doing the vast majority of work.
- If you assign the wrong PI, reach out to the IRB.
  - Only the IRB staff can change the PI for a created study.



# **CITI** training

- Be sure to affiliate with Temple University, <u>not</u> Temple Hospital
  - Easiest way is signing in via the IRB website linked on previous slide
- Two required courses:
  - Biomedical Research or Social/Behavioral Research takes ~1-4 hours
  - Practice Runs Training 1 module, takes ~5 minutes
- Does not need to be completed prior to submitting to the IRB but...
- Needs to be completed by everyone on the study before the IRB will approve the study



# General IRB tips

- When planning, give at least 2 months for a submission to be approved.
  - The first review can take up to a month and there may be Mods Required.
  - Check in with a coordinator if you haven't heard from us after a month.
- Read HRP-070, -071, -802, and -803.
  - <a href="https://research.temple.edu/research-compliance/institutional-review-board-irb/irb-forms-standard-operating-procedures">https://research.temple.edu/research-compliance/institutional-review-board-irb/irb-forms-standard-operating-procedures</a>
- An hour of checking your work can save weeks in time-to-approval.
- The IRB approves and stamps all consents forms and consent scripts.
- Use ERA as your repository for clean protocols, consents, and recruitment materials
  - That way you are always using / modifying the approved documents.
- If you have questions, reach out to a coordinator.
  - https://research.temple.edu/research-compliance/meet-our-staff#IRB



## Submitting to the IRB: Basics

- CITI training
  - First time: research.temple.edu > Research Compliance > Institutional Review Board (IRB) > IRB Trainings and Resources
    - <a href="https://research.temple.edu/research-compliance/institutional-review-board-irb/irb-trainings-and-resources">https://research.temple.edu/research-compliance/institutional-review-board-irb/irb-trainings-and-resources</a>
  - Subsequent visits: <a href="mailto:citiprogram.org">citiprogram.org</a>
- IRB template documents
  - research.temple.edu > Research Compliance > Institutional Review Board (IRB) > Investigator Quick Links
    - <a href="https://research.temple.edu/research-compliance/institutional-review-board-irb/investigator-quick-links">https://research.temple.edu/research-compliance/institutional-review-board-irb/investigator-quick-links</a>
- ERA (the website that submissions to and communications from the IRB occur)
  - era.temple.edu
  - User guide at research.temple.edu > ERA > Training Tutorials & Documentation
    - https://www.temple.edu/research/researchadmin/era/era\_login.asp

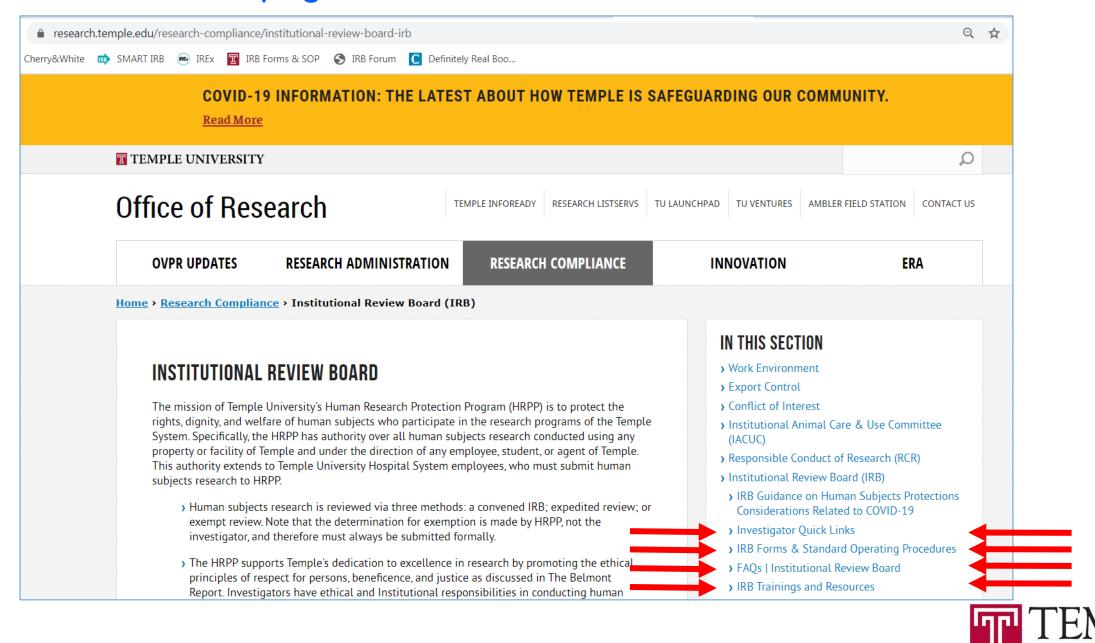


# Protocol and consent templates

- Download the Word docs from the website.
- Don't leave in the instructional language.
- The IRB focuses on the abstract, title, investigator, and study design
  - Particularly: timing, inclusion/exclusion, what data will be accessed / collected, privacy & confidentiality, recruitment, study methods, and consent methods
- Make sure the IRB knows what you're doing, why you're doing it, and can grant a waiver of HIPAA authorization (consult HRP-428 for the requirements) if doing a retrospective chart review.
- To the website! (https://research.temple.edu/research-compliance/institutional-review-board-irb/investigator-quick-links)



## IRB document pages; look under "IN THIS SECTION"



UNIVERSITY

## Protocol and consent tips

- Provide Word docs and tracked changes in Word (if a response)
- Be consistent across all study documents.
  - Participant duration, N, if identifiers are linked to data via a key, etc.
- Don't describe durations with dates, use months / weeks / years.
  - Bad: Recruitment completed by December 2019.
  - Good: Recruitment completed 3 months after IRB approval.
- If recording (video or audio), it must be in the consent.
- Minimal risk research usually does not require signed consent.
  - If you need signed consent (research with minors, HIPAA, etc.), the signature blocks are in the Main Informed Consent Template.
- Only include the consent summary if the study is federally funded <u>and</u> the consent body is longer than 4 pages.
- Double-check you're using the approved document as the base for any Modifications.
- Unless you are accessing medical records, you do not need HIPAA Authorization.

# Chart review protocol template

- Don't leave in the instructional language
- When possible, use the methodology provided in the table (section 8d)
- The IRB focuses on the abstract, title, investigator, and study design (particularly timing, inclusion/exclusion, what will be accessed, and privacy & confidentiality)
- Make sure the IRB knows what you're doing, why you're doing it, and can grant a waiver of HIPAA authorization (consult HRP-428 for the requirements)
- To the website! (https://research.temple.edu/research-compliance/institutional-review-board-irb/investigator-quick-links)

## **ERA**

- ERA is the portal through which Investigators and the IRB communicate (submissions and responses) officially.
- The IRB / ERA User Guide is helpful and has screen shots, but you will waste time and effort if you don't use the table of contents.
  - https://www.temple.edu/research/researchadmin/era/era login.asp
- era.temple.edu > sign in > My Human Subjects
- Before going to the website, some tips.



## **ERA** tips

- Make sure that you're in My Human Subjects, not My Proposals.
- Only full-time faculty can be the PI.
  - The 3<sup>rd</sup> prompt will ask for the PI, but will automatically have your name in it. Change to the correct PI.
- Immediately add the Application for Human Research (see User Guide pages 13-15).
- Immediately add yourself to the Application for Human Research (eForm).
  - If you don't you won't be able to access the record in the future.
- When all documents (minimum eForm and protocol) are uploaded, click submit, I agree, and continue.
  - Ensure it says "Electronic Submission Pending" on the Submissions page.
  - Emails are generally sent to your / your Pl's @temple.edu address.
- The Department Head needs to be in the approval route for initial subs.
  - If your PI is the DH, then add the Dean.
- Upload docs via "Add" button, Not the Attachments tab.

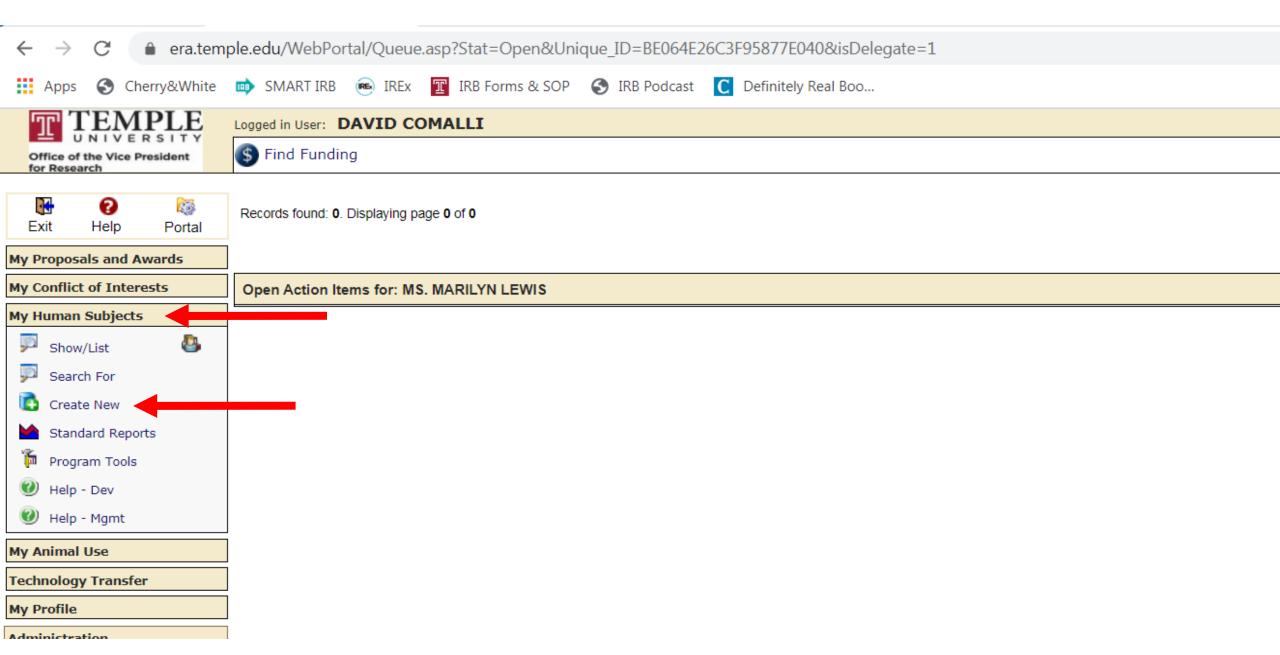


## Screenshot notes

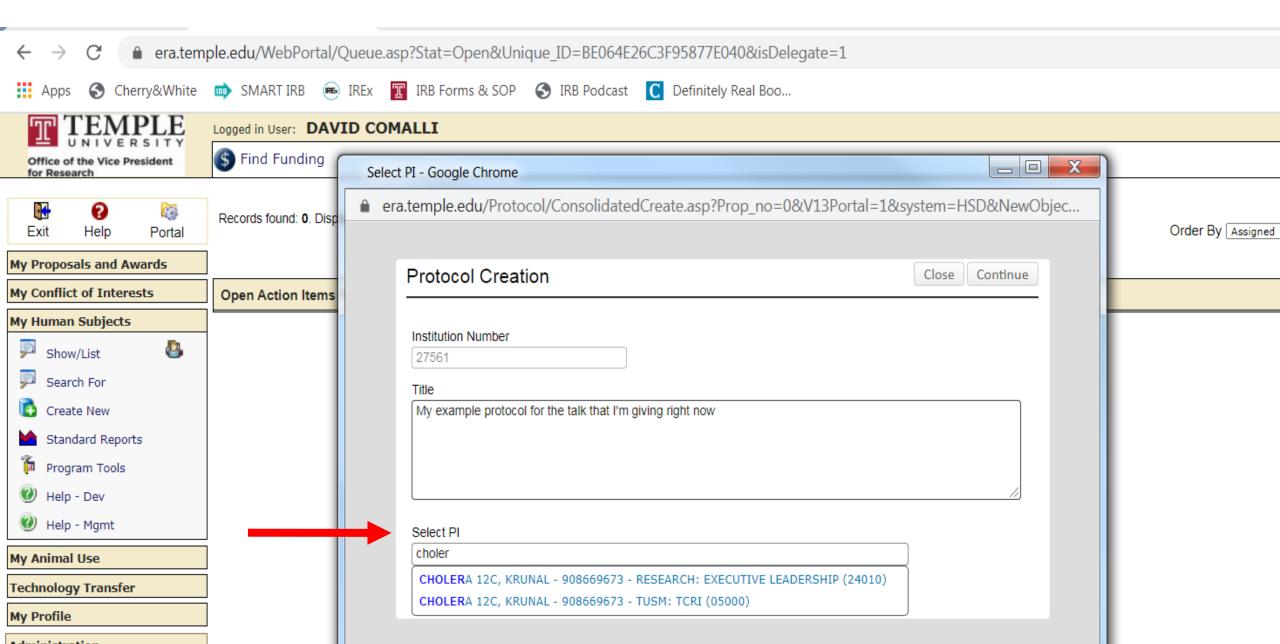
- This is not a 1 slide, 1 click format. There are some gaps and some steps that are combined within 1 screenshot.
- Pop-up windows that are in the screenshot will not exist until a button (like "Add") on the main page is clicked.
- The pop-ups may appear in a different part of the screen or not be fully visible as they are in the screenshots.
- Use the red arrows to denote the button/clicking sequence.



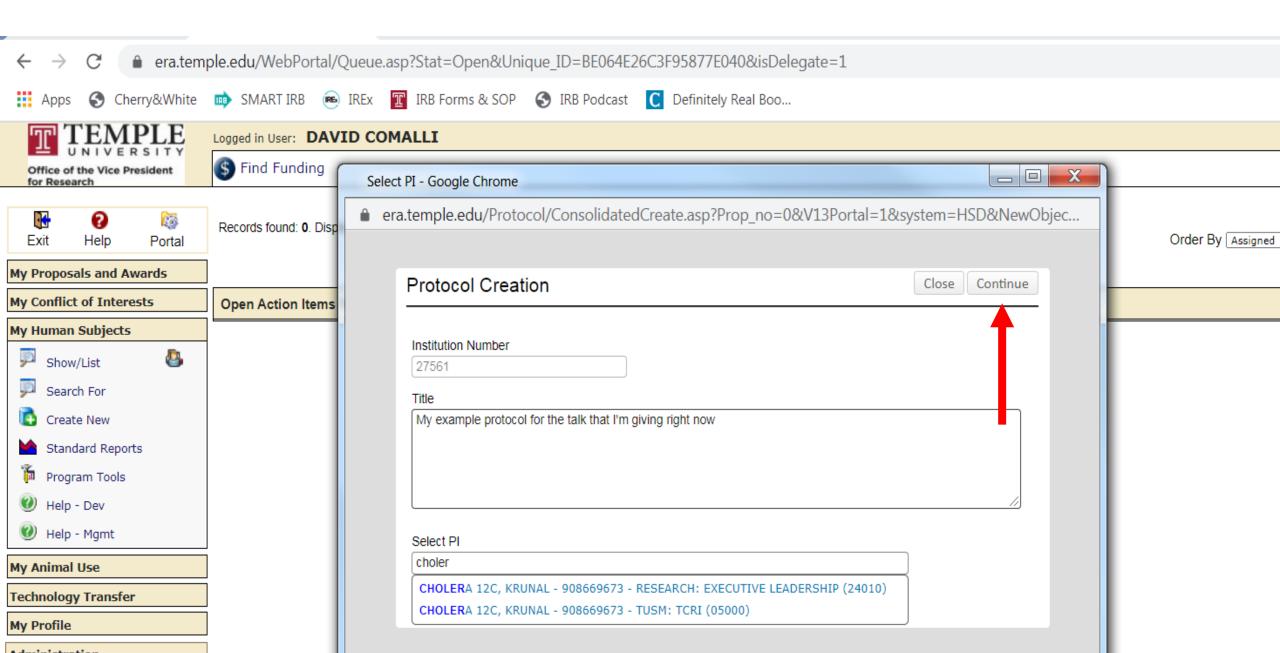
#### My Human Subjects > Create New



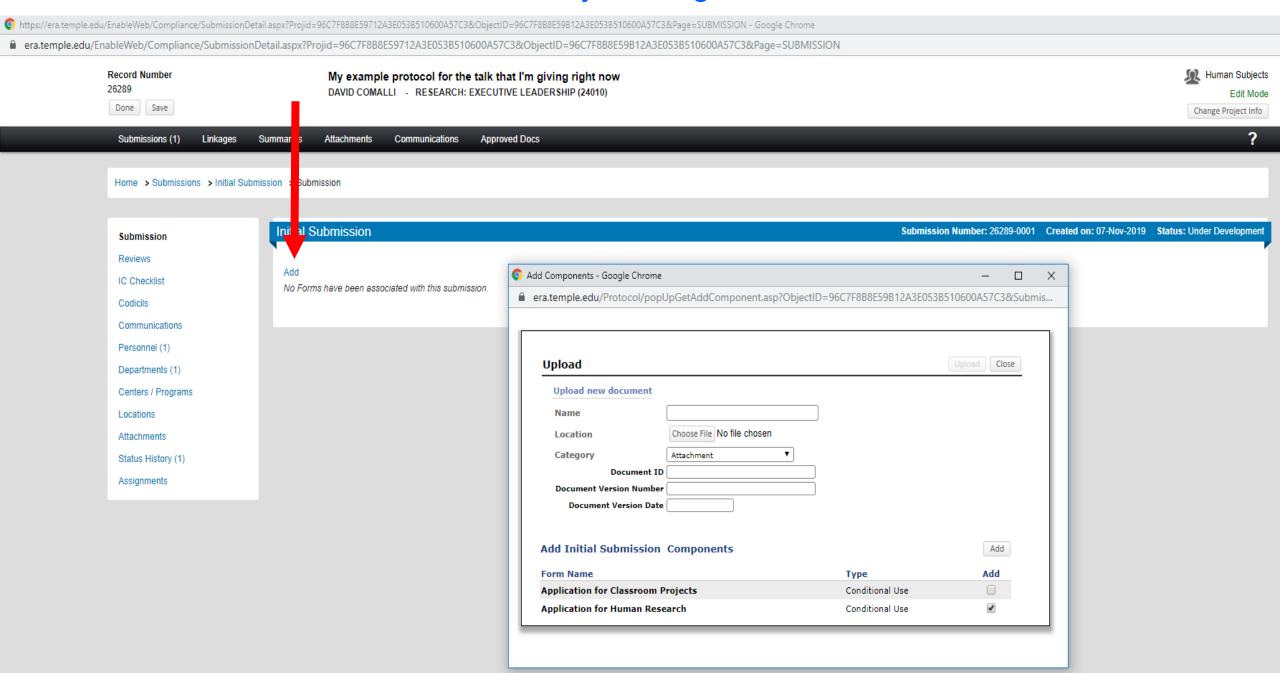
## MAKE SURE TO SELECT THE RIGHT PI Your name will show up automatically, delete and search for PI if it's not you



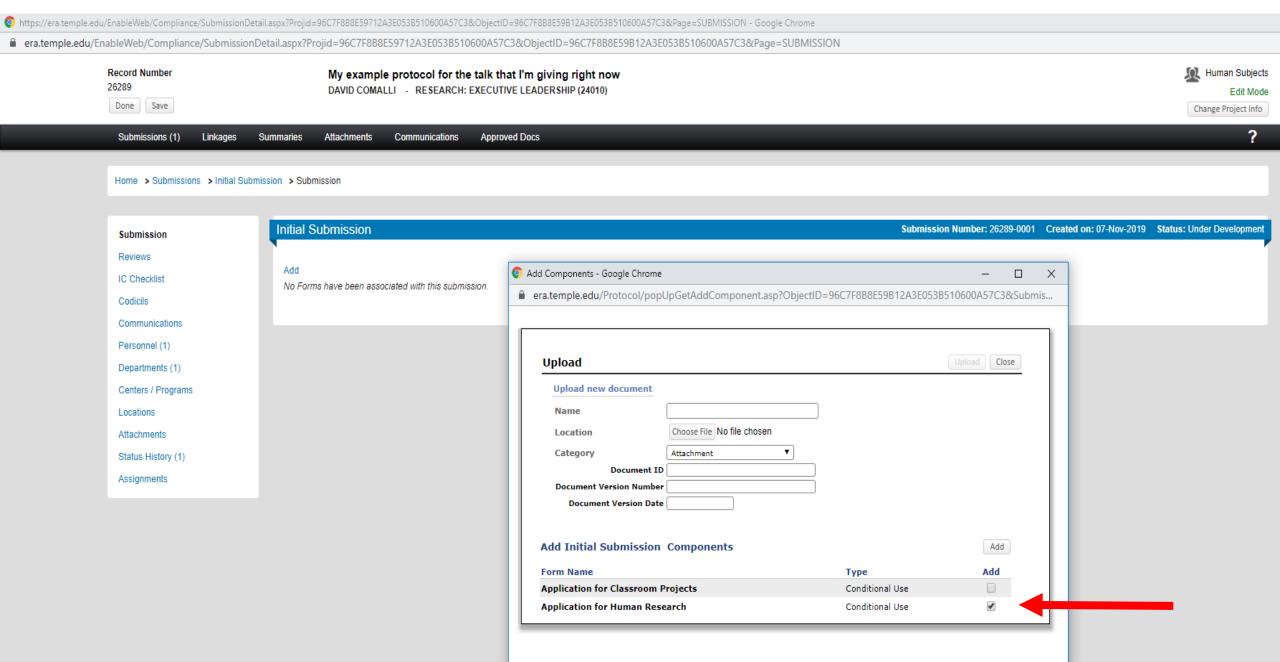
#### Click Continue and be directed to the Initial Submission



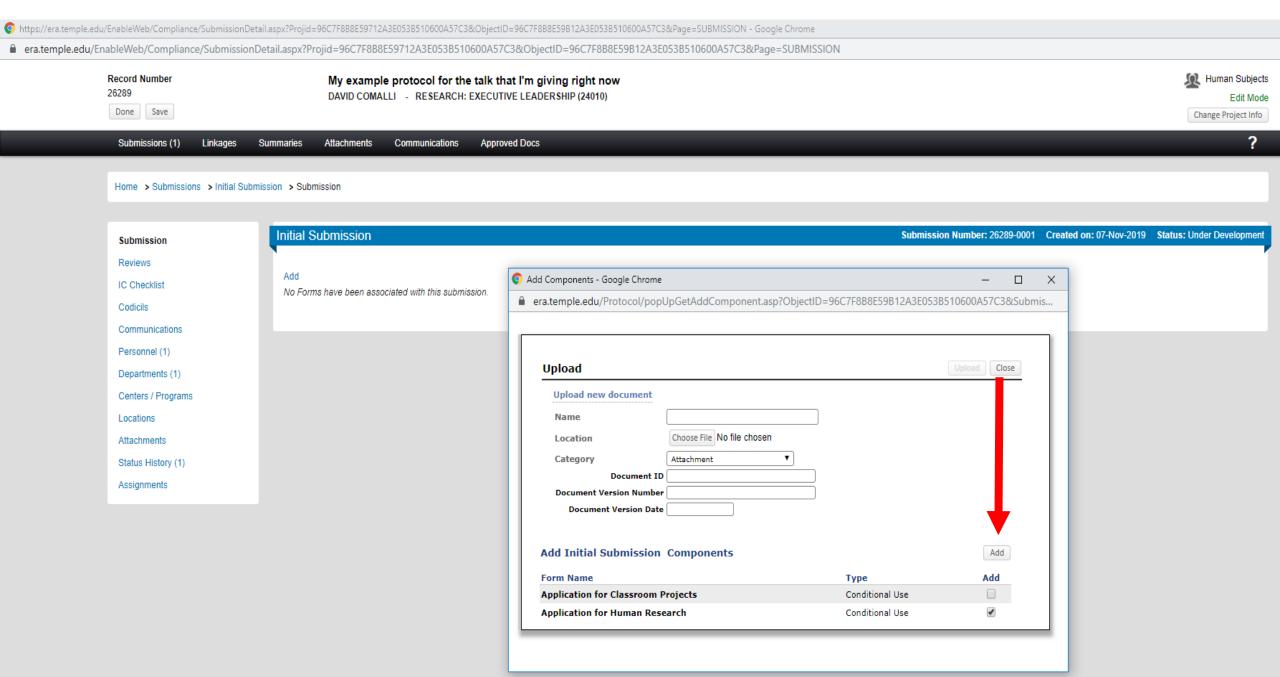
### Add documents by clicking the "Add" button



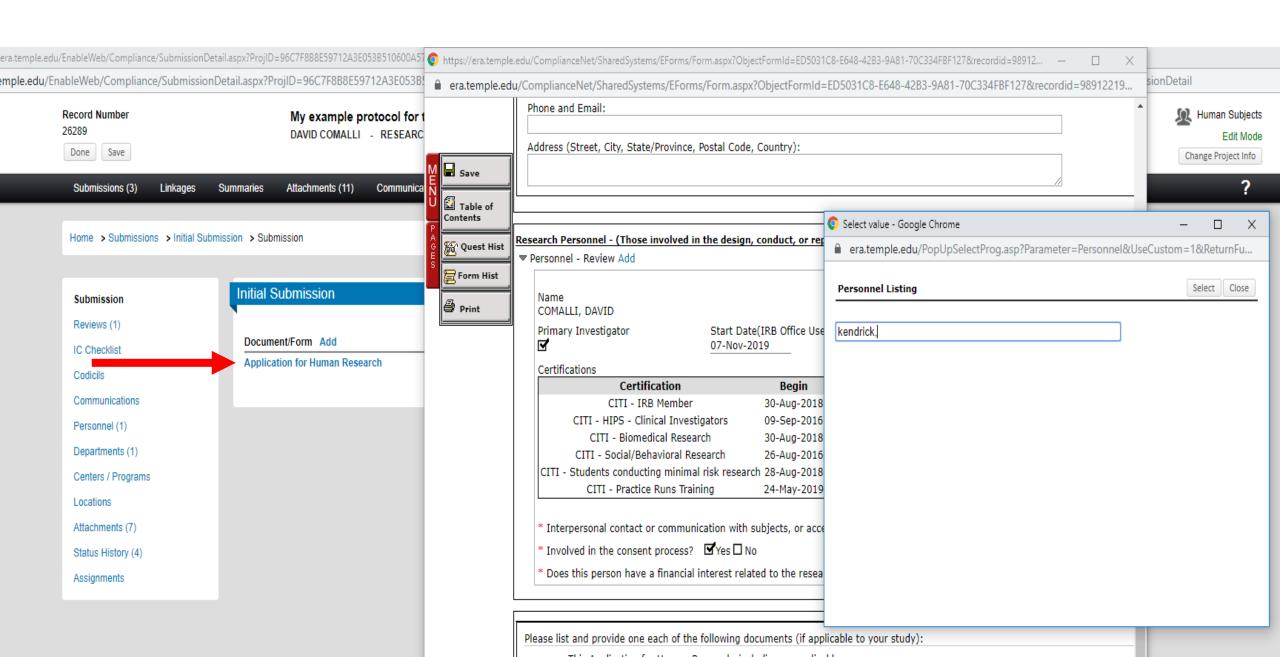
### Always create the Application for Human Research eForm first



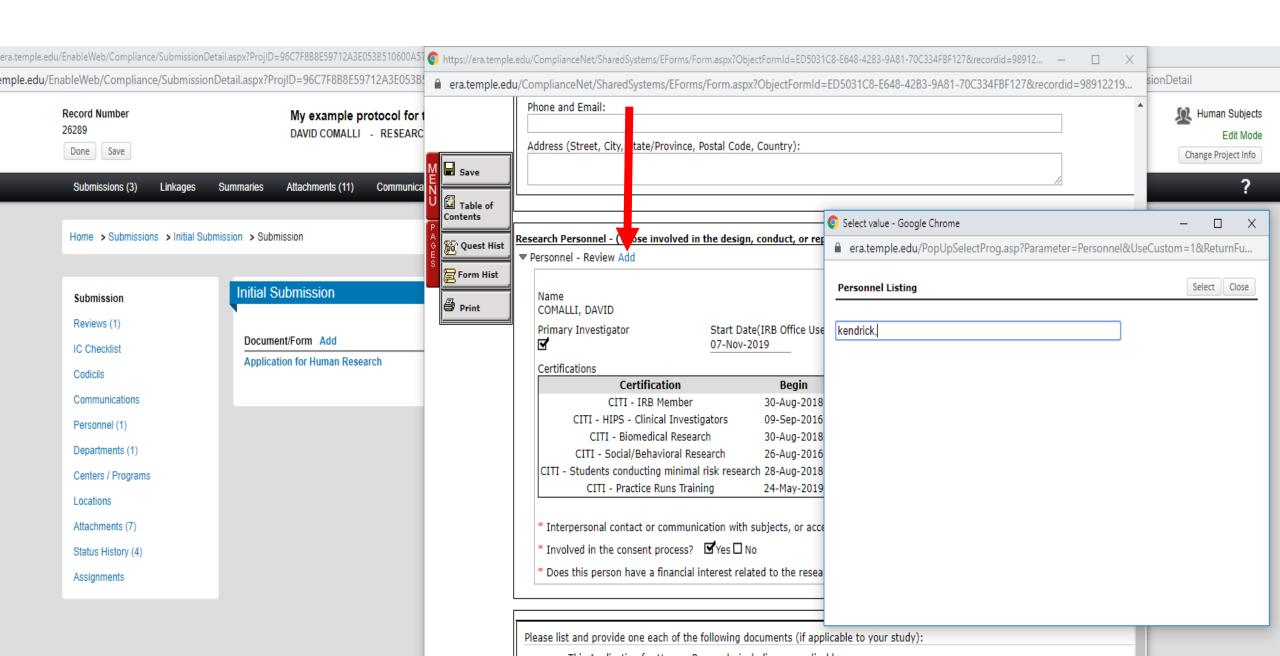
#### Click the lower "Add" button to add the eForm



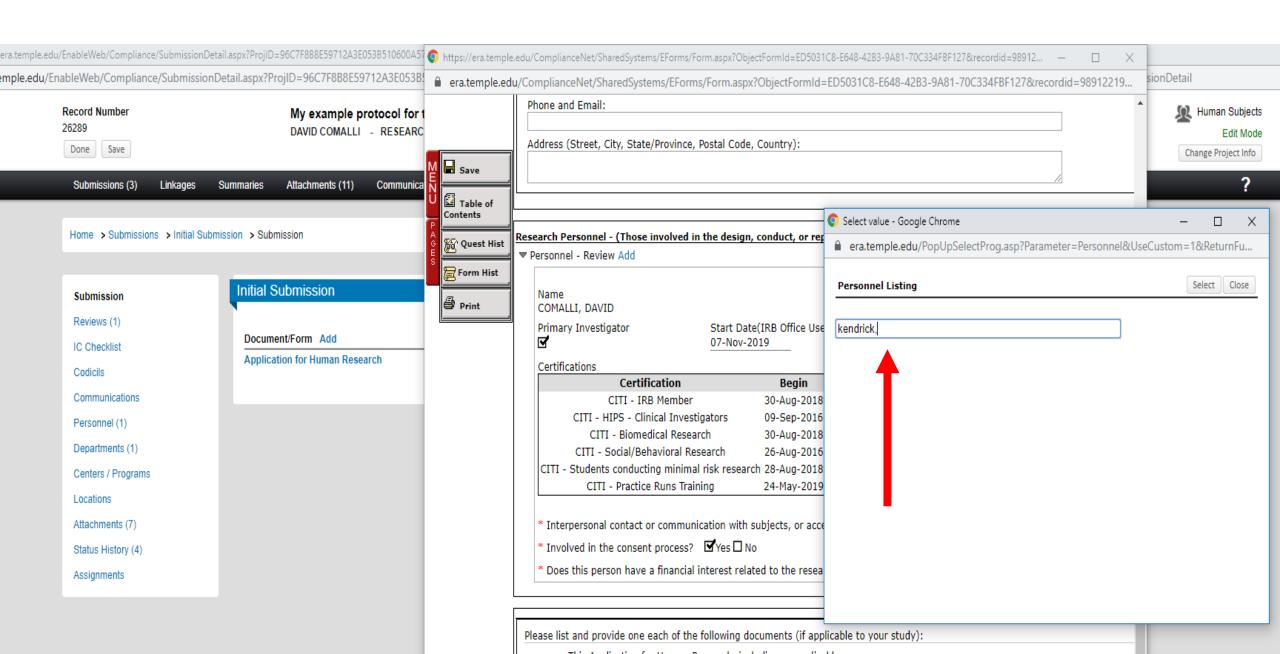
### Open the eForm



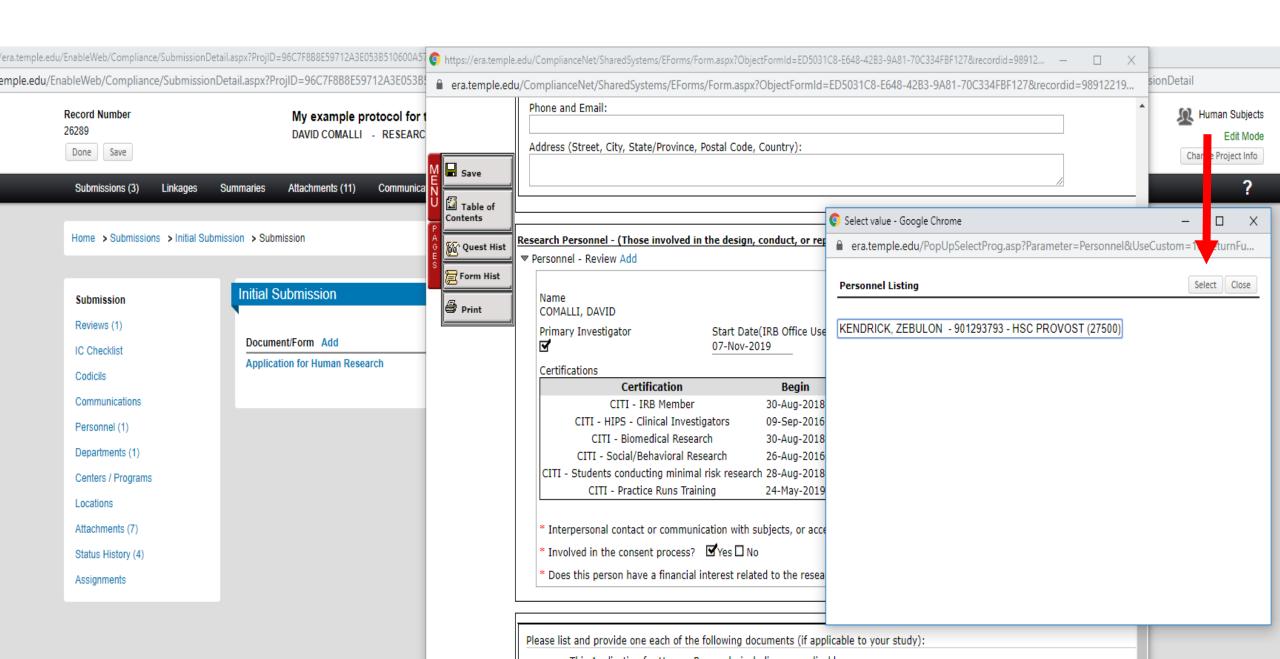
## Add all research personnel, especially yourself (if you're not the PI)



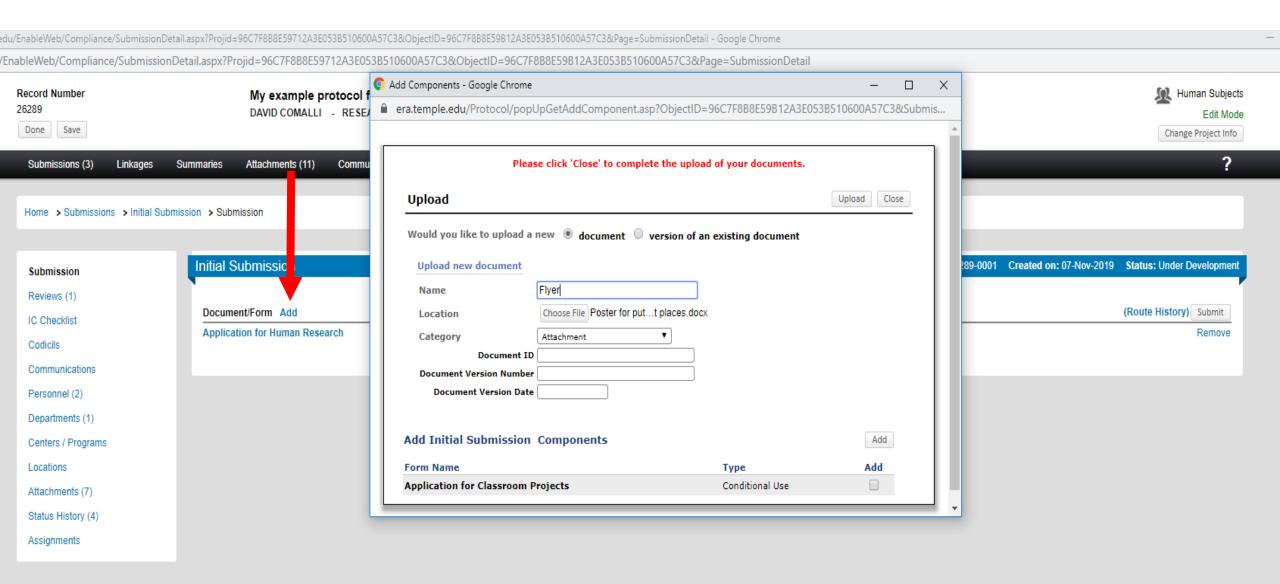
## Start typing the last name of the person you're adding and click their name



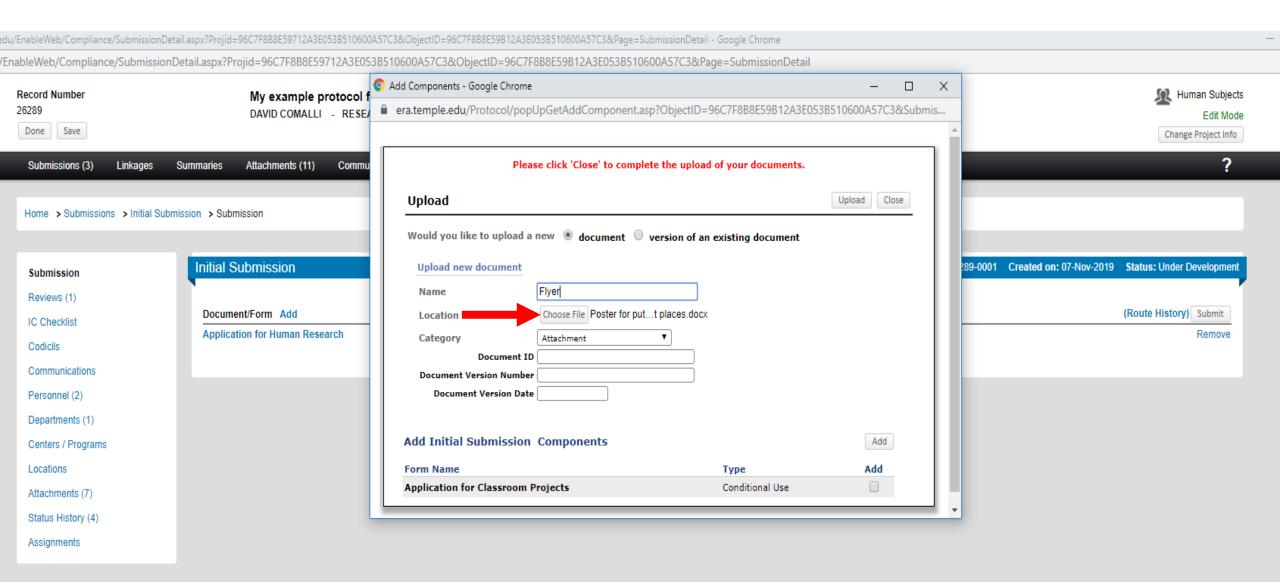
## Click "Select" button; continue adding personnel and then complete the eForm



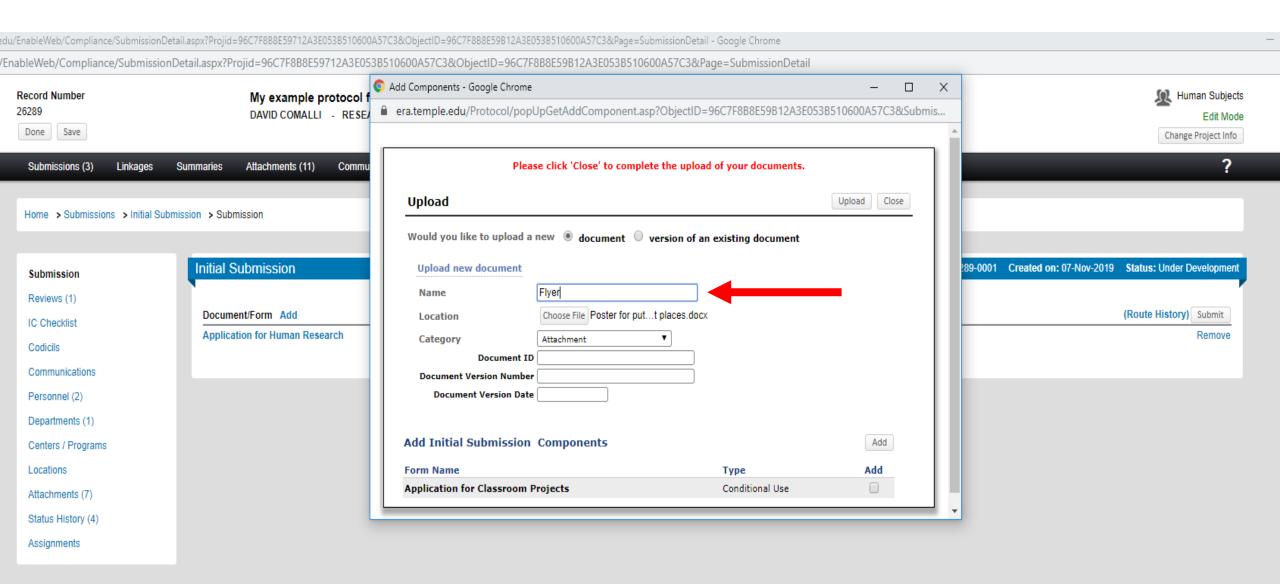
### Add additional study documents by clicking the "Add" button



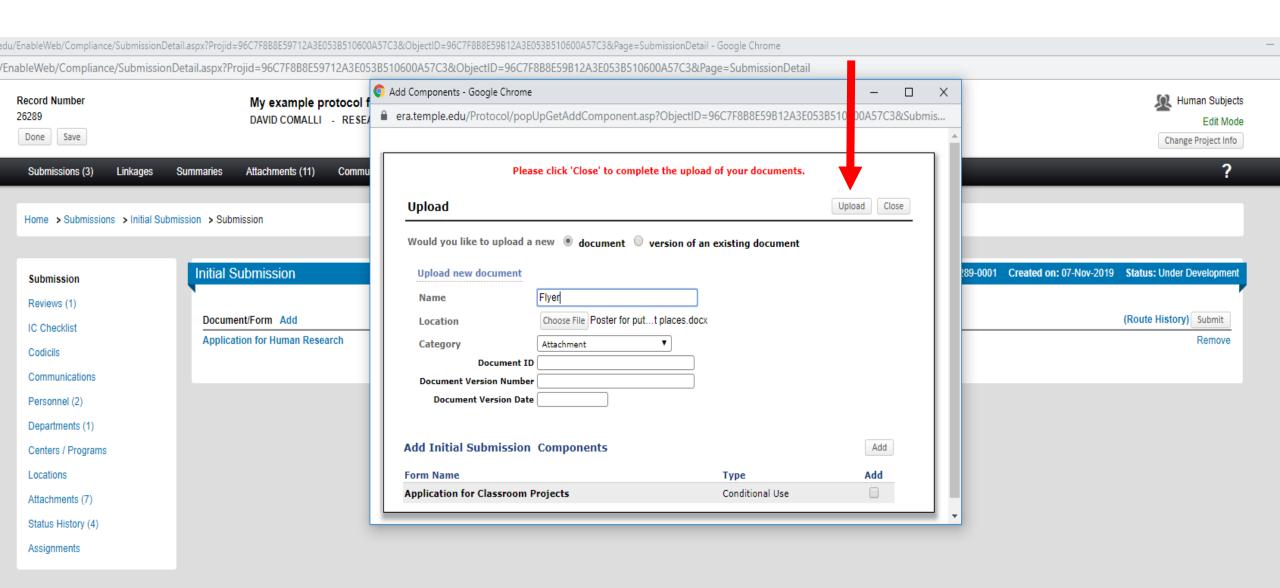
#### Click "Choose File" and find the document



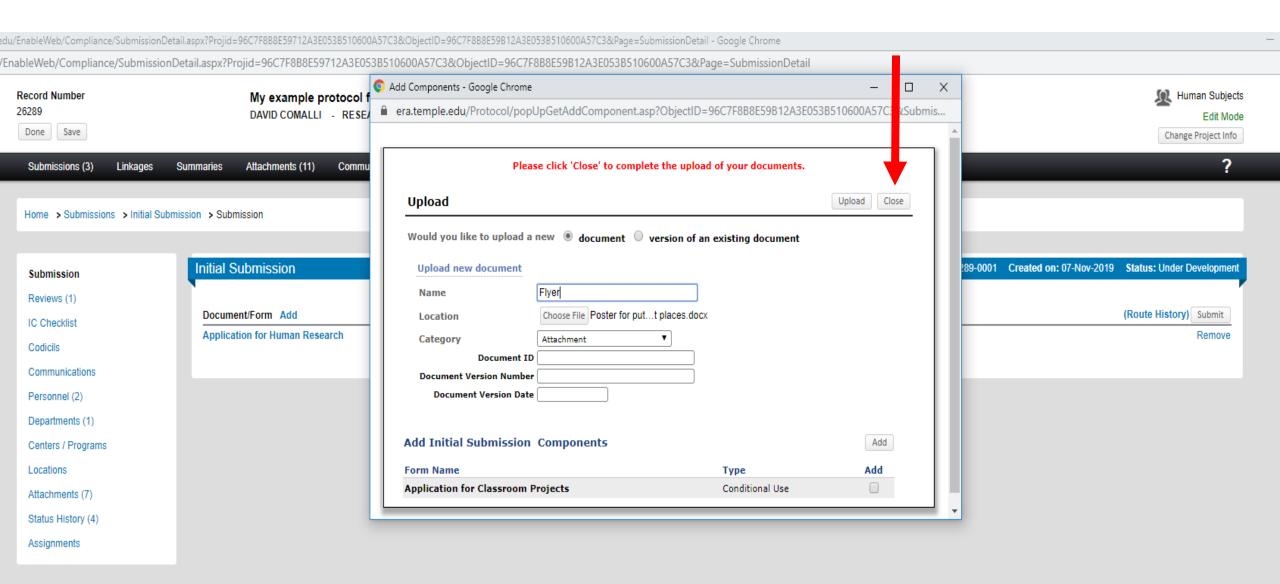
#### "Name" should be succinct and informative; It's what the IRB will see



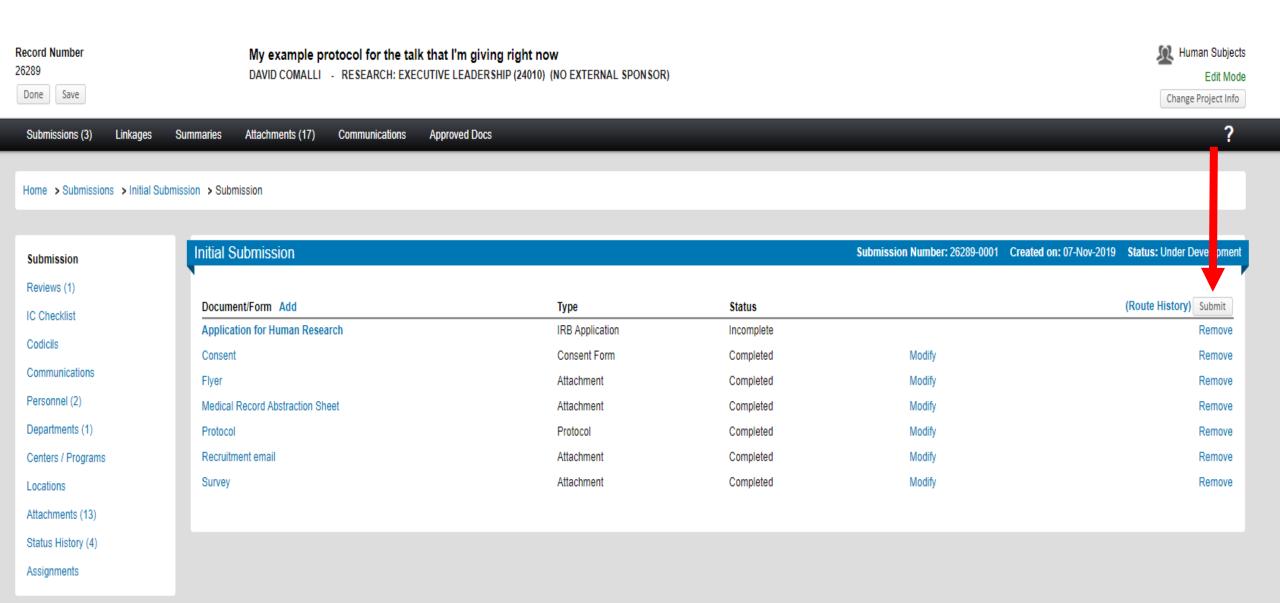
### Click "Upload"; See pop-up window refresh; repeat



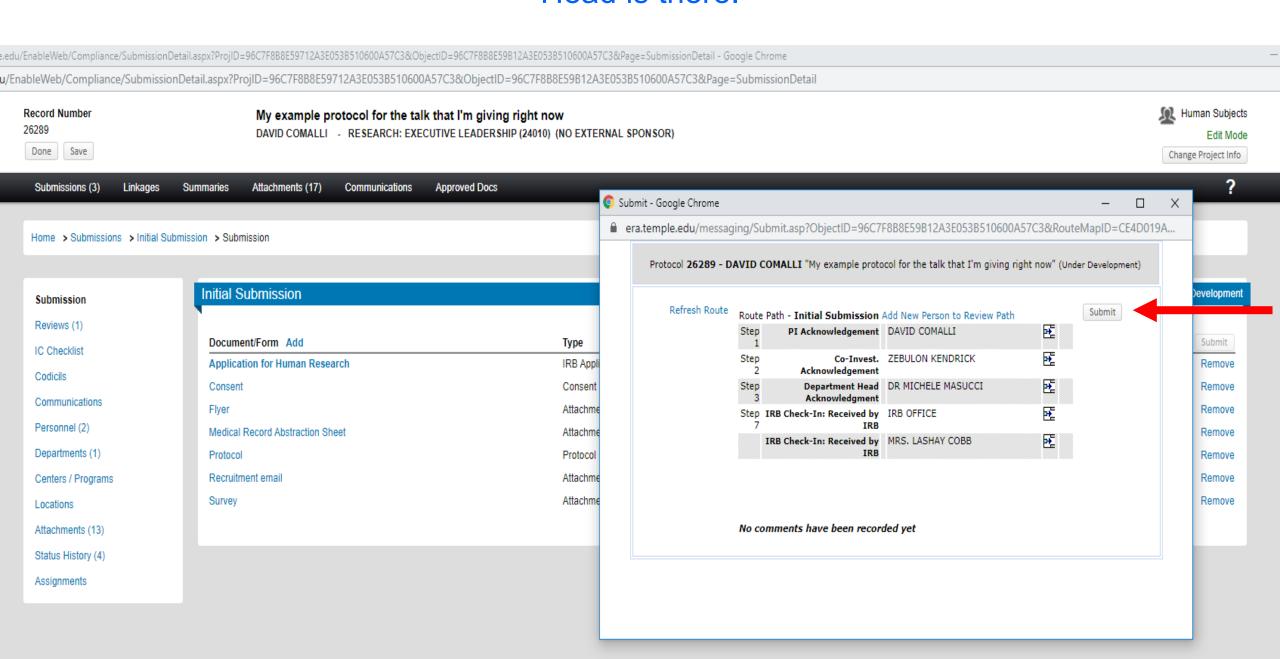
### Clicking "Close" will refresh the main page and show all uploaded documents



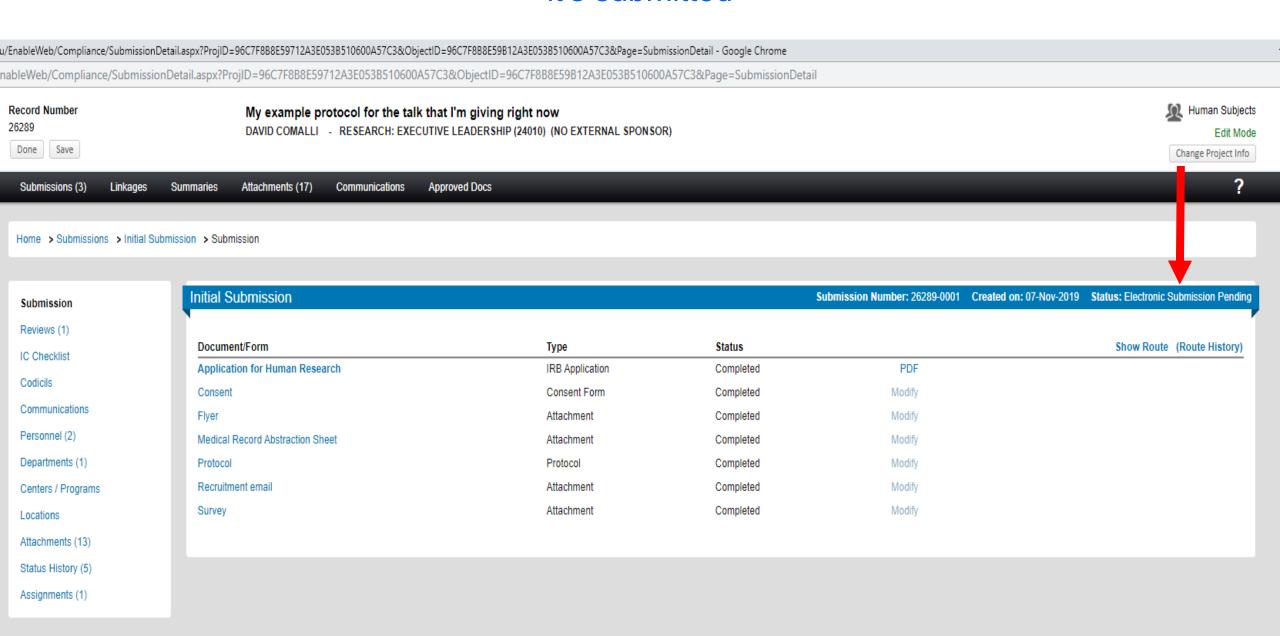
### Click "Submit" when all documents are uploaded; Note it's not actually submitted yet



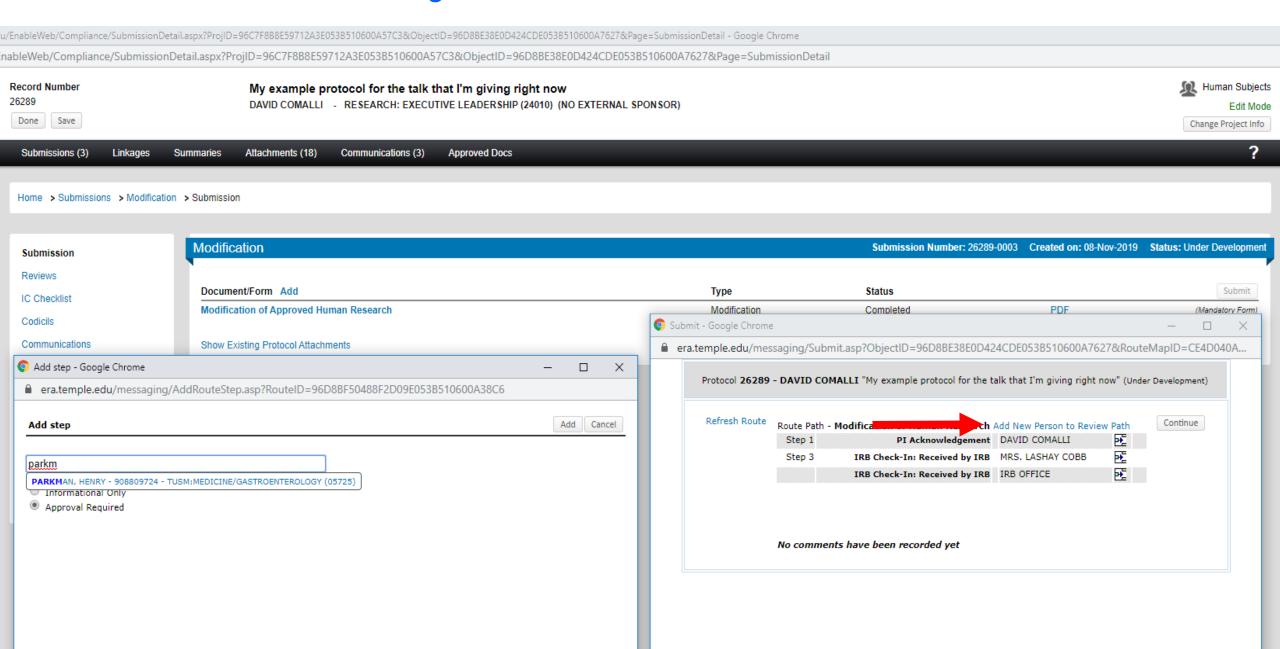
### After the attestation, inspect the approval route and click submit; Make sure the Dept. Head is there.



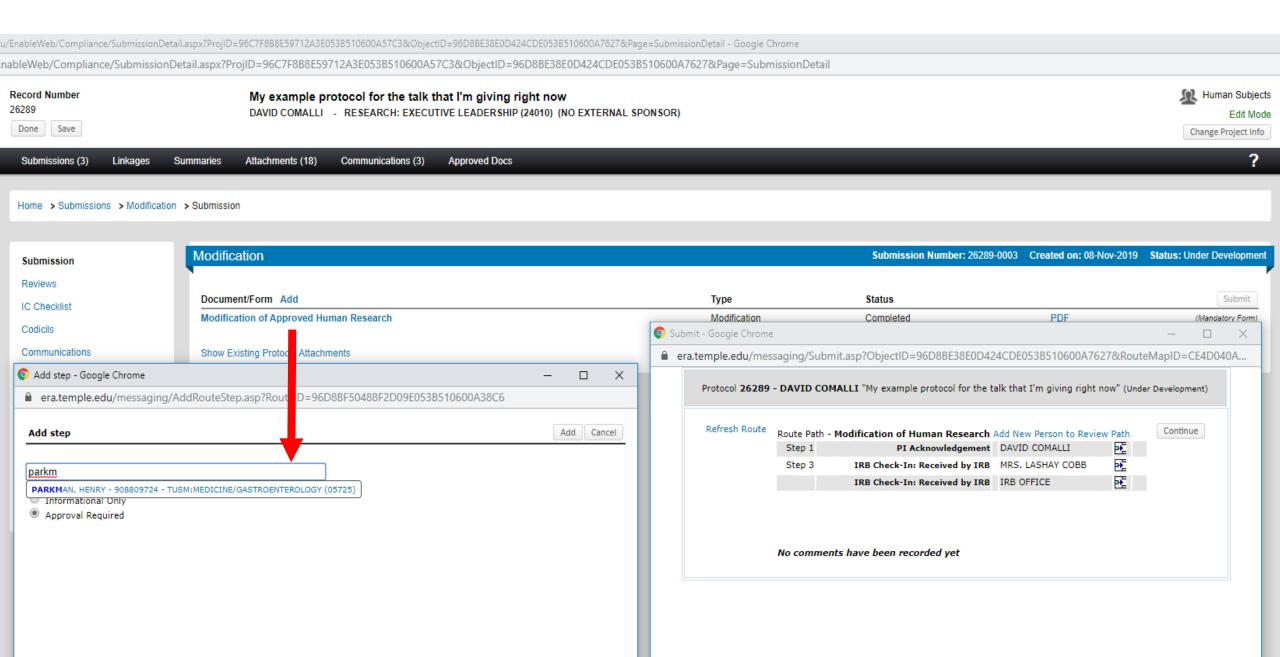
### Status will change from "Under Development" to "Electronic Submission Pending" once it's submitted



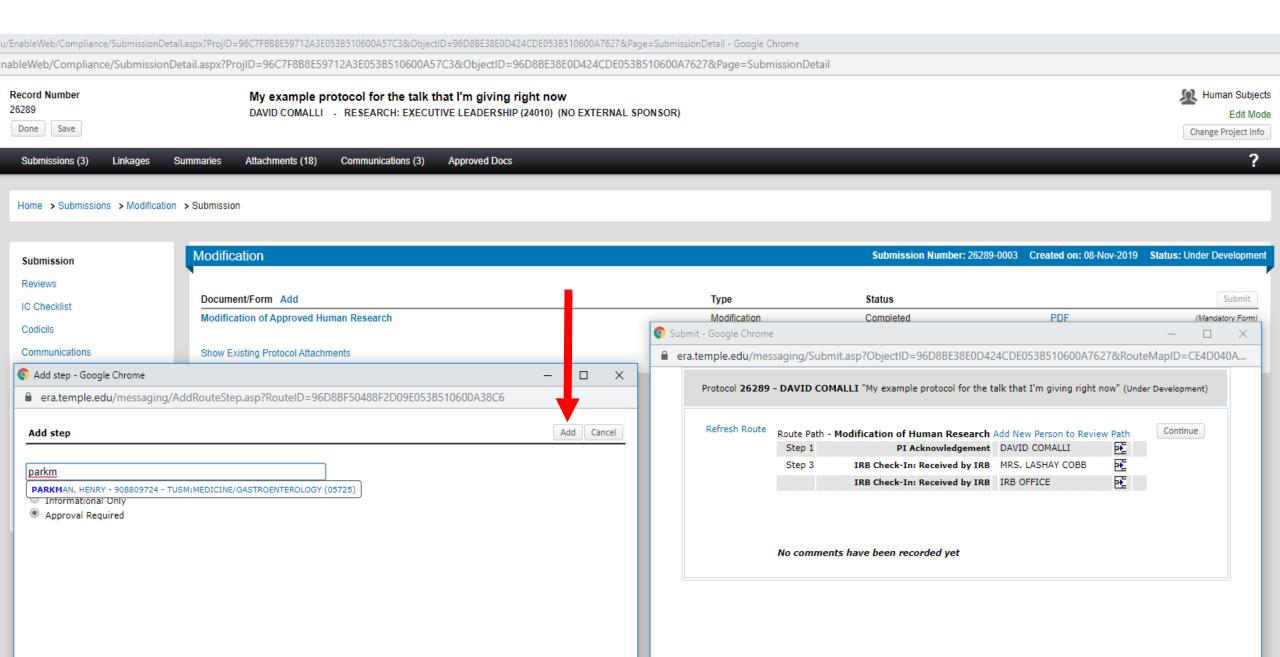
### If adding Temple (Hospital or University) personnel, add them to the approval route by clicking "Add New Person to Review Path"



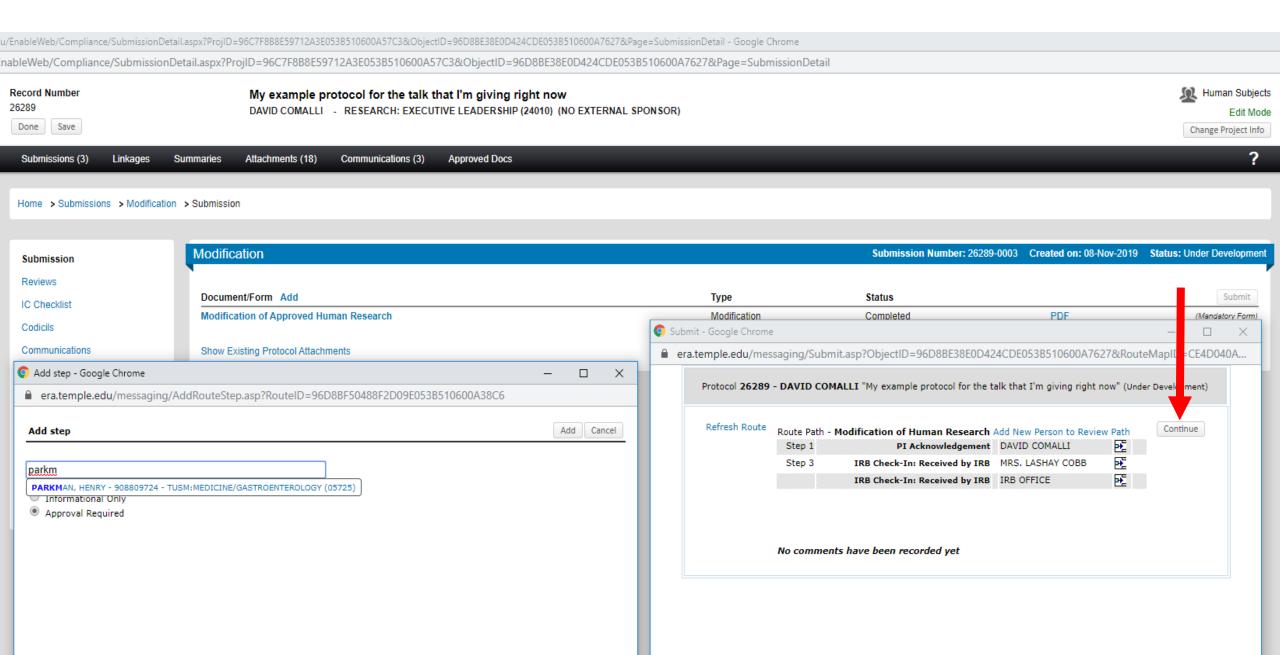
### Type the last name and select the person



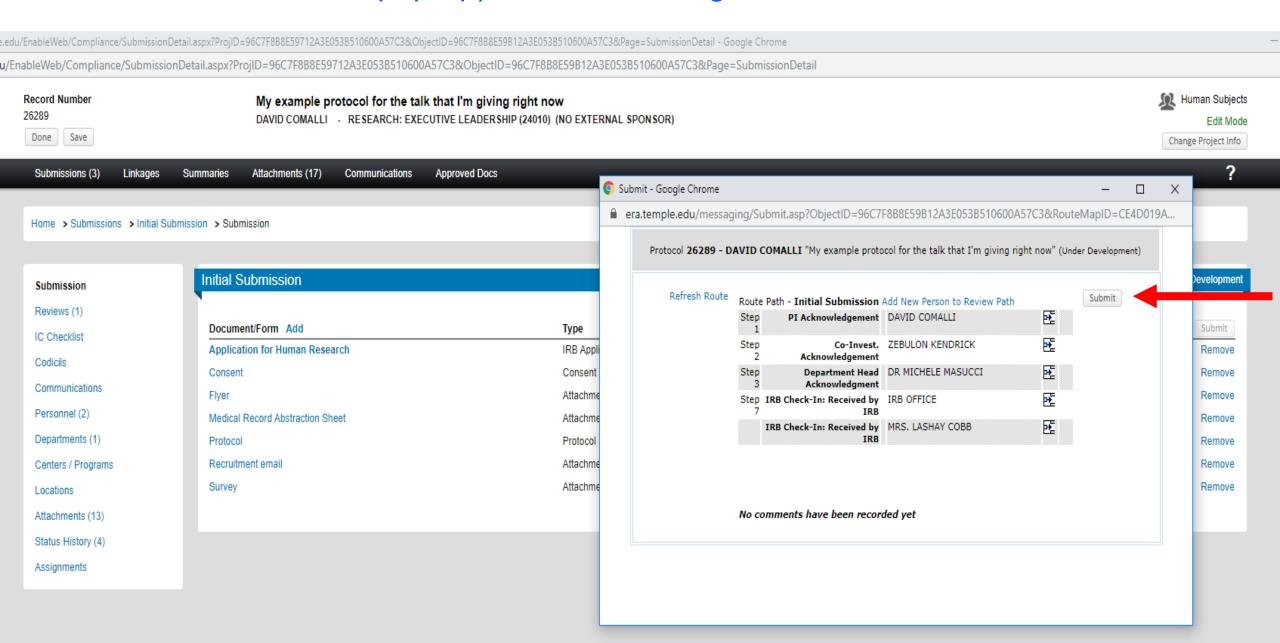
### Click "Add" and repeat until all new personnel are added



#### Look at the approval route and click "Continue"



## You will get an email after the person ahead of you (as indicated in the previous approval route pop-up) has acknowledged the submission



### Open the Acknowledge email (from OFFICE\_OLD, IRB); click "Reviewer Dashboard"

An Initial Application For Your Review D Inbox x

OFFICE\_OLD, IRB

to me 🕶

An Initial Application has been submitted to the Institutional Review Board. Your Approval is required for this submission.

Please click the link below to review and comment on the following application

IRB #:26289

Principal Investigator: DAVID COMALLI

Department:RESEARCH: EXECUTIVE LEADERSHIP (24010) Title:My example protocol for the talk that I'm giving right now

Sponsor:NO EXTERNAL SPONSOR

Your approval is required for this submission.

Click here for a short version of instructions on how to review this submission.

REMEMBER TO SAVE YOUR WORK BY CLICKING ON "SAVE" IN THE UPPER RIGHT-HAND SIDE OF THE REVIEWER'S DASHBOARD!!!!!

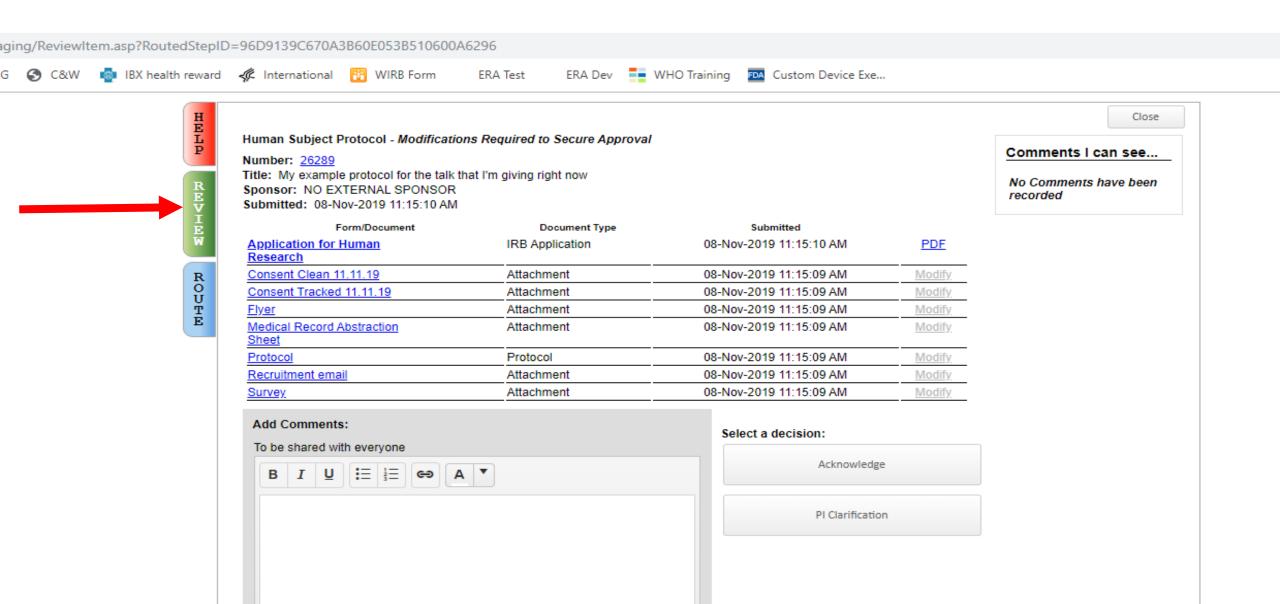
To add your review, click here Reviewer Dashboard



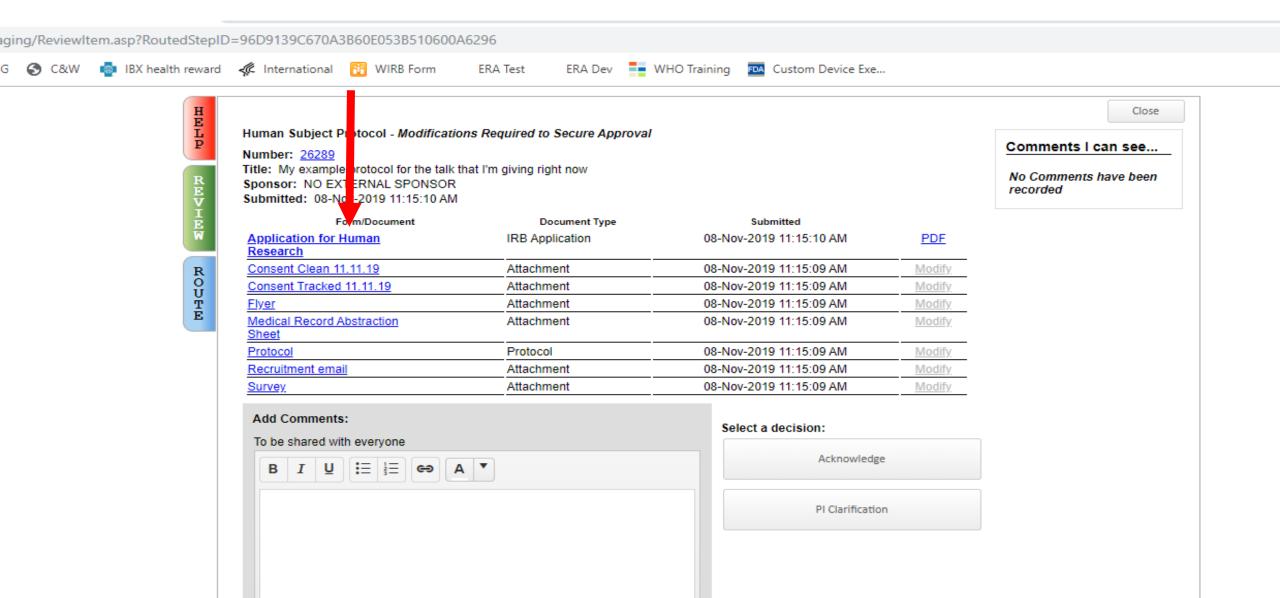
To review the entire submission, click here Open Submission Package

If you have questions about the approval process, please contact the IRB Office at (215) 707-3390.

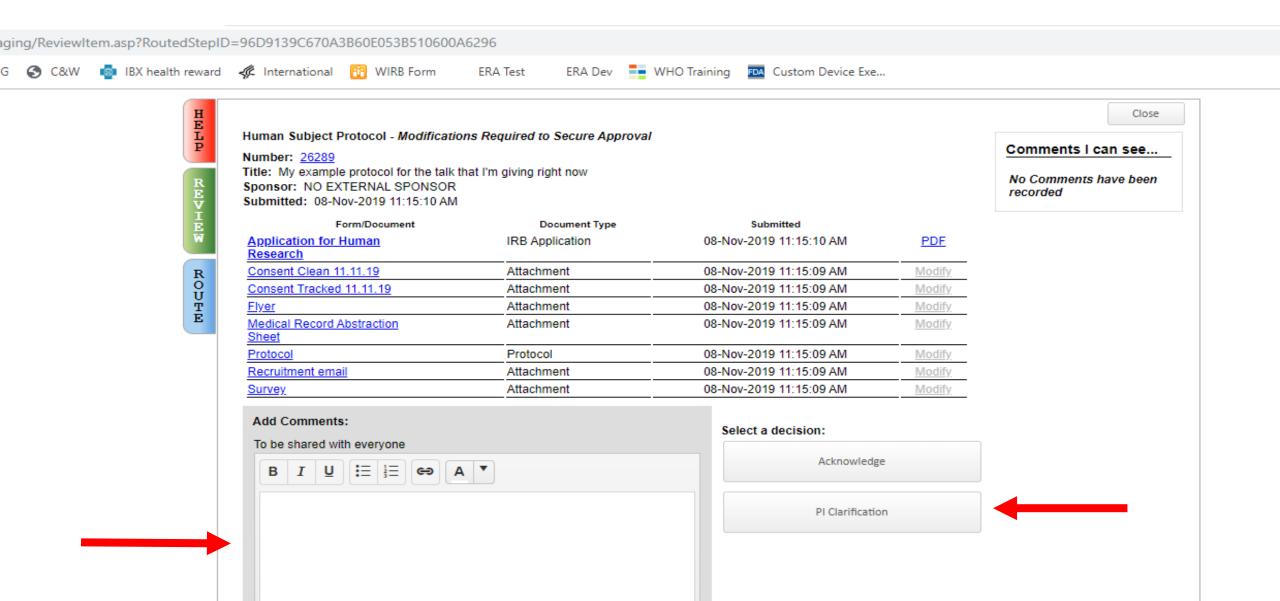
#### You may need to sign into ERA; Click the "Review" tab



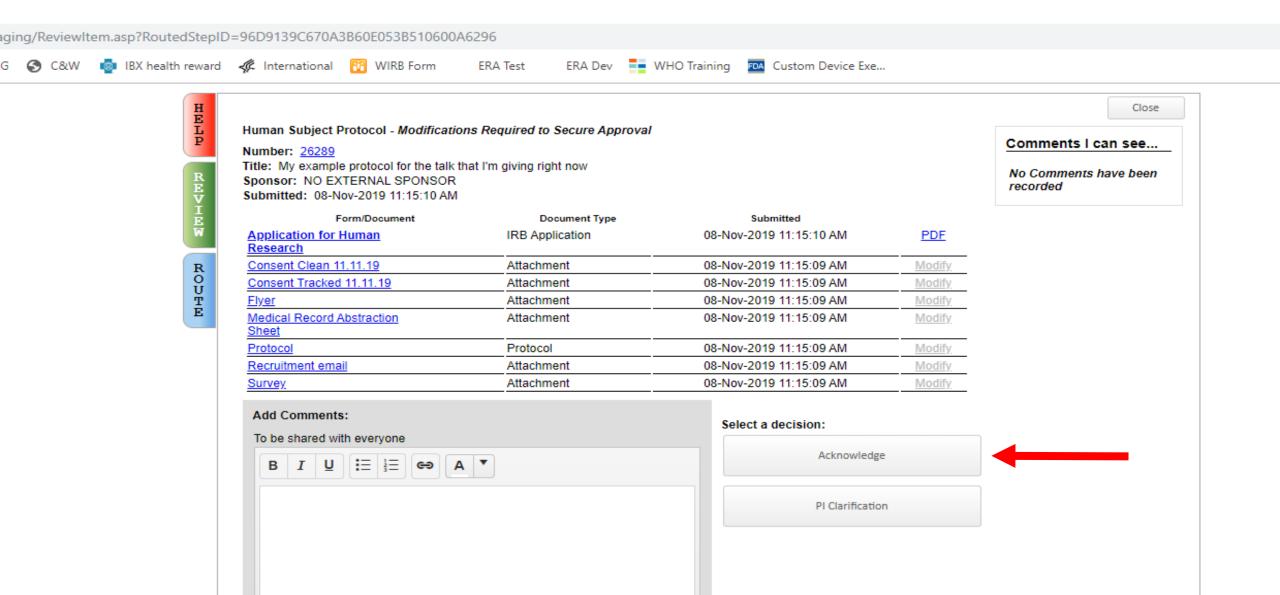
#### Review documents by clicking on them



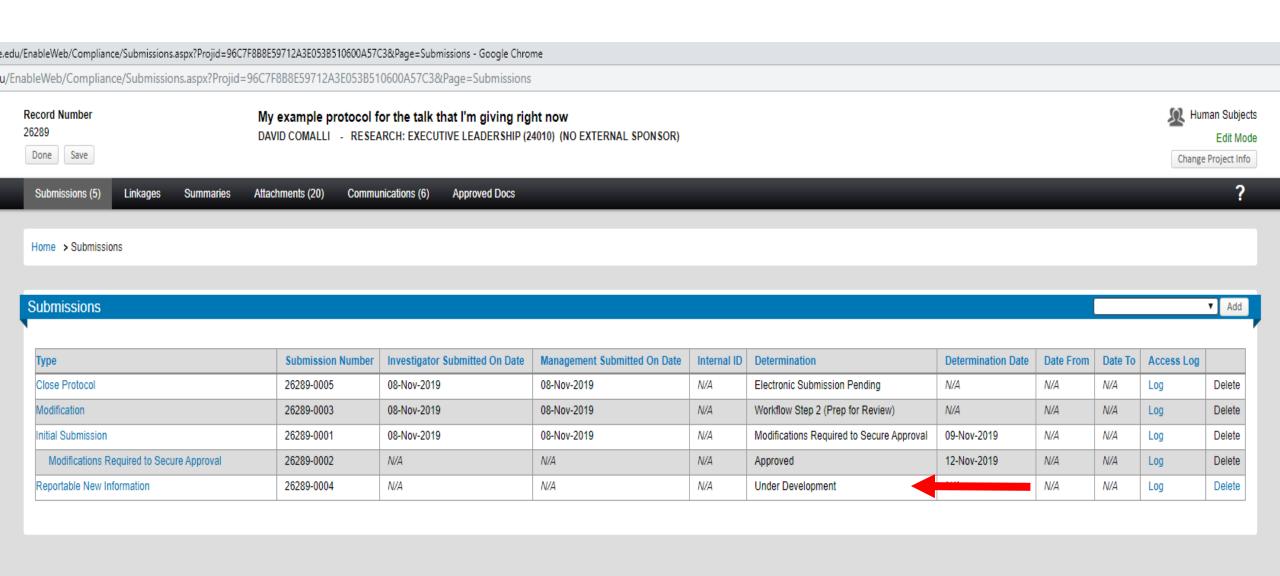
## If you notice an error, you can stop the approval route (so the error can be fixed) by adding a Comment and clicking "PI Clarification"; Re-submit after fix(es)



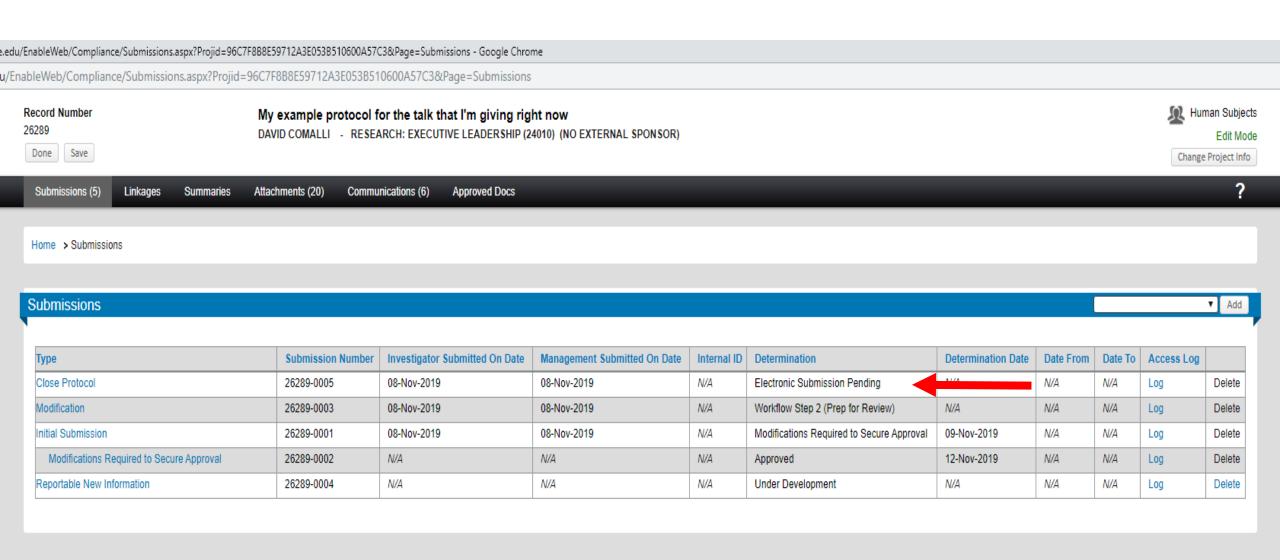
### If the contents are acceptable, click "Acknowledge" and agree to the subsequent attestation



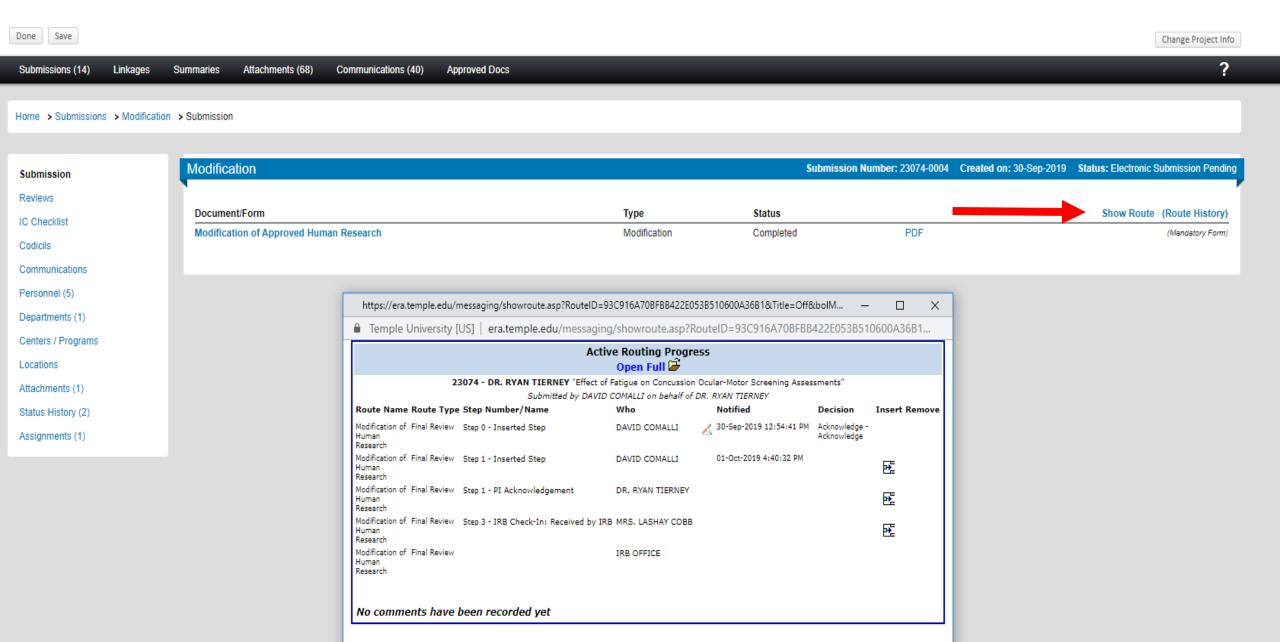
### Status can be viewed on the "Submissions" page as well; "Under Development" means not submitted



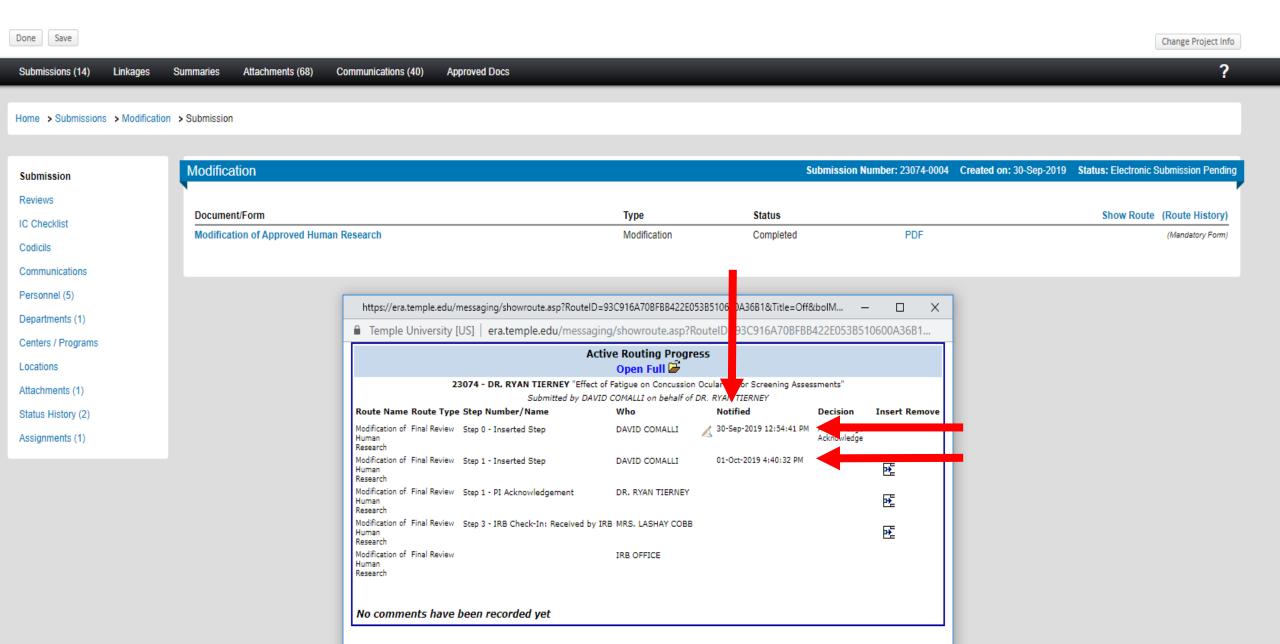
# If something is "Electronic Submission Pending," Then it's been submitted to—but not brought into—the IRB



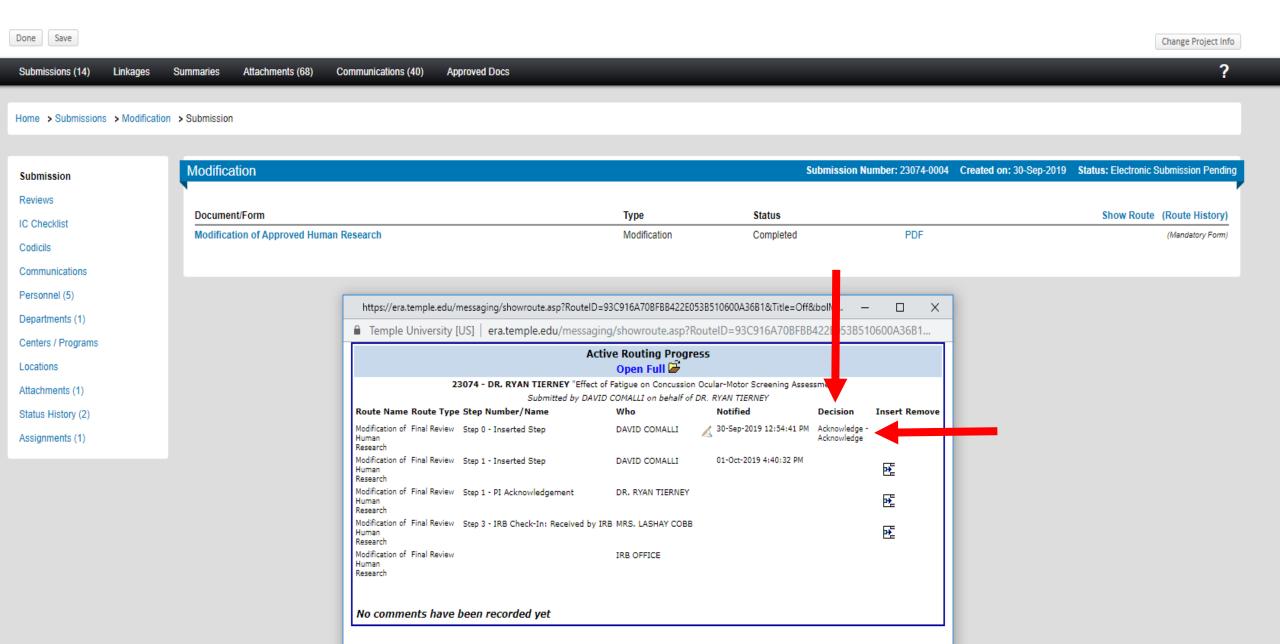
### At any time, click "Show Route" to see who has Acknowledged and been notified



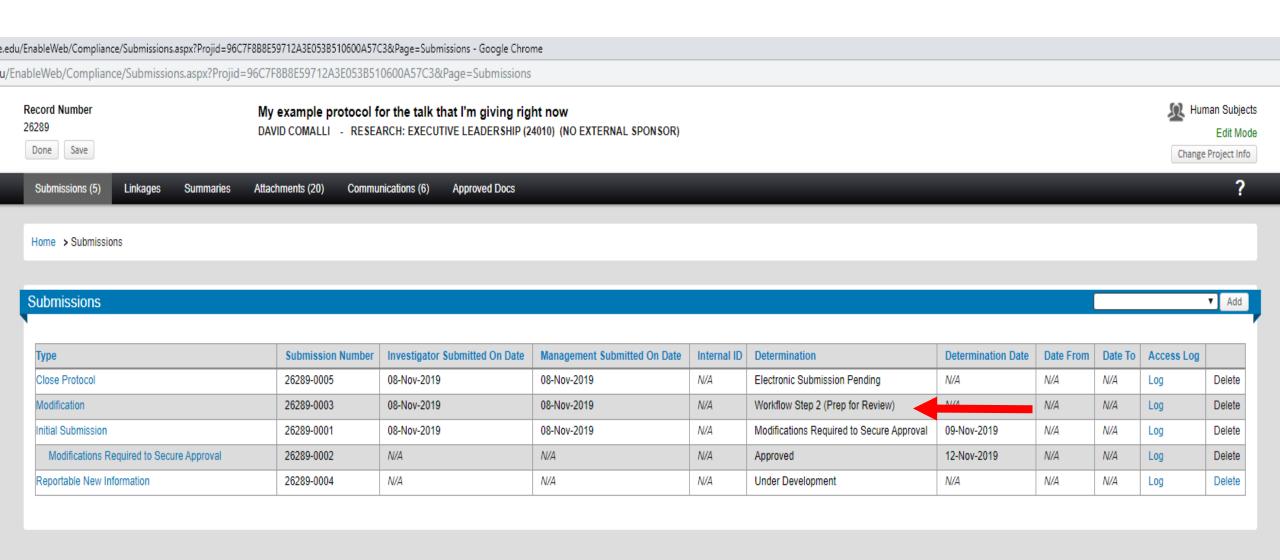
### The date under "Notified" only reflects when a person was notified



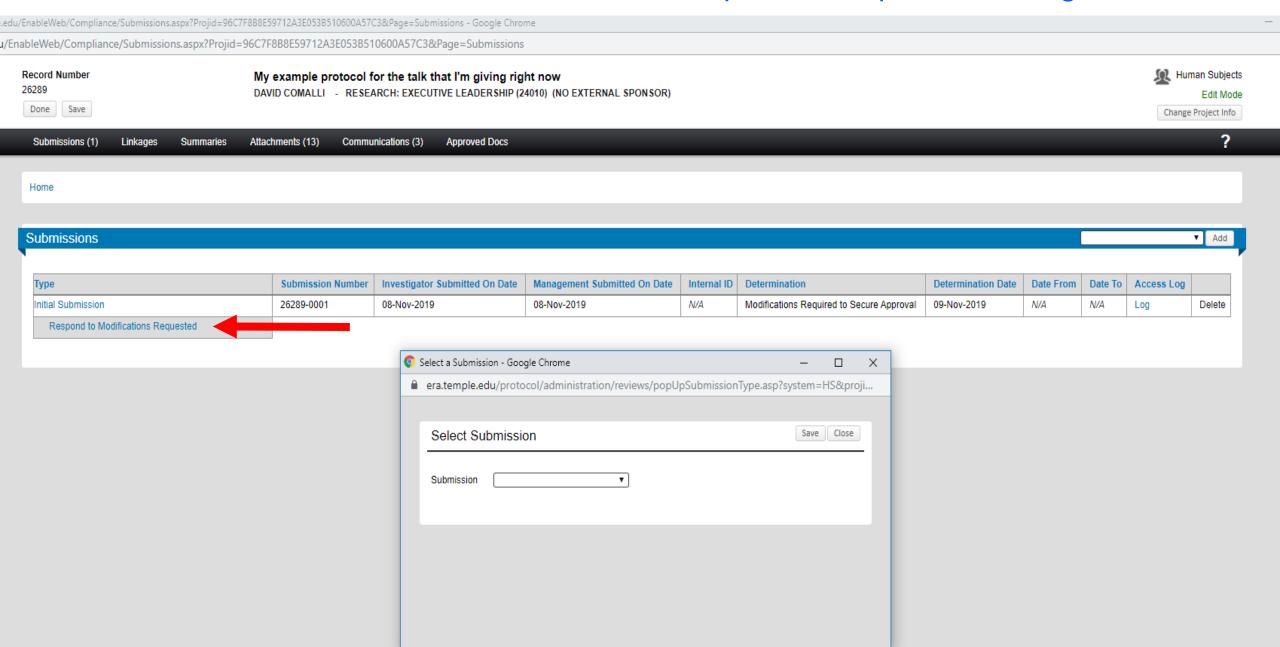
# They haven't acknowledged without the "Acknowledge - Acknowledge" under "Decision"; Hover over Ack – Ack to see (left hand, top corner) when the person Acknowledged



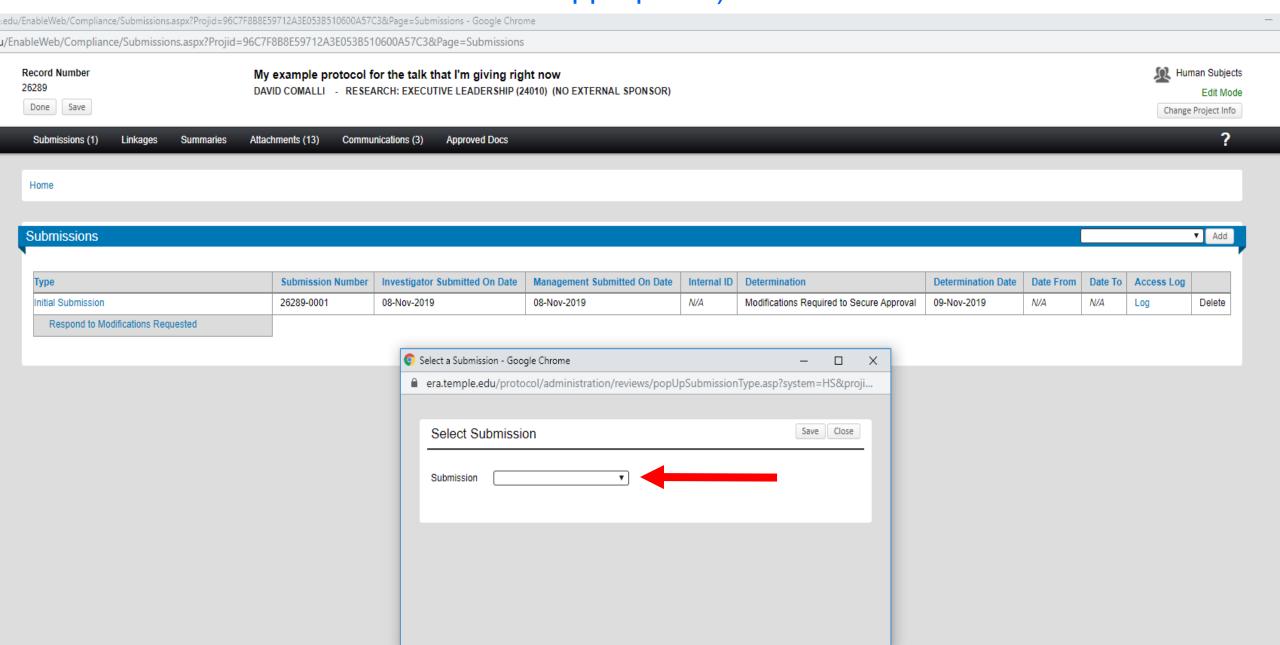
### "Workflow Step 2" reflects that the IRB has the submission, but has yet to review it



## Respond to "Modifications Required to Secure Approval" by clicking the "Respond..." link; Don't create a "Modification" to respond to requested changes



# Select "Modifications Required to Secure Approval" from the dropdown (or "Deferred" if appropriate)



### Remove documents that are requested to be changed; Don't remove the eForm; Don't use the Modify feature

du/EnableWeb/Compliance/SubmissionDetail.aspx?Projid=96C7F8B8E59712A3E053B510600A57C3&ObjectID=96D84568D867134AE053B510600AC3CF&Page=SubmissionDetail - Google Chrome

EnableWeb/Compliance/SubmissionDetail.aspx?Projid=96C7F8B8E59712A3E053B510600A57C3&ObjectID=96D84568D867134AE053B510600AC3CF&Page=SubmissionDetail

Record Number 26289

Done

My example protocol for the talk that I'm giving right now

DAVID COMALLI - RESEARCH: EXECUTIVE LEADERSHIP (24010) (NO EXTERNAL SPONSOR)

Human Subjects

Edit Mode

Change Project Info

Submissions (2)

Save

Linkages

Summaries

Attachments (14)

Communications (3)

Approved Docs

Home > Submissions > Modifications Required to Secure Approval > Submission

Submission Reviews

IC Checklist

Codicils

Communications

Personnel (2)

Departments (1)

Centers / Programs

Locations

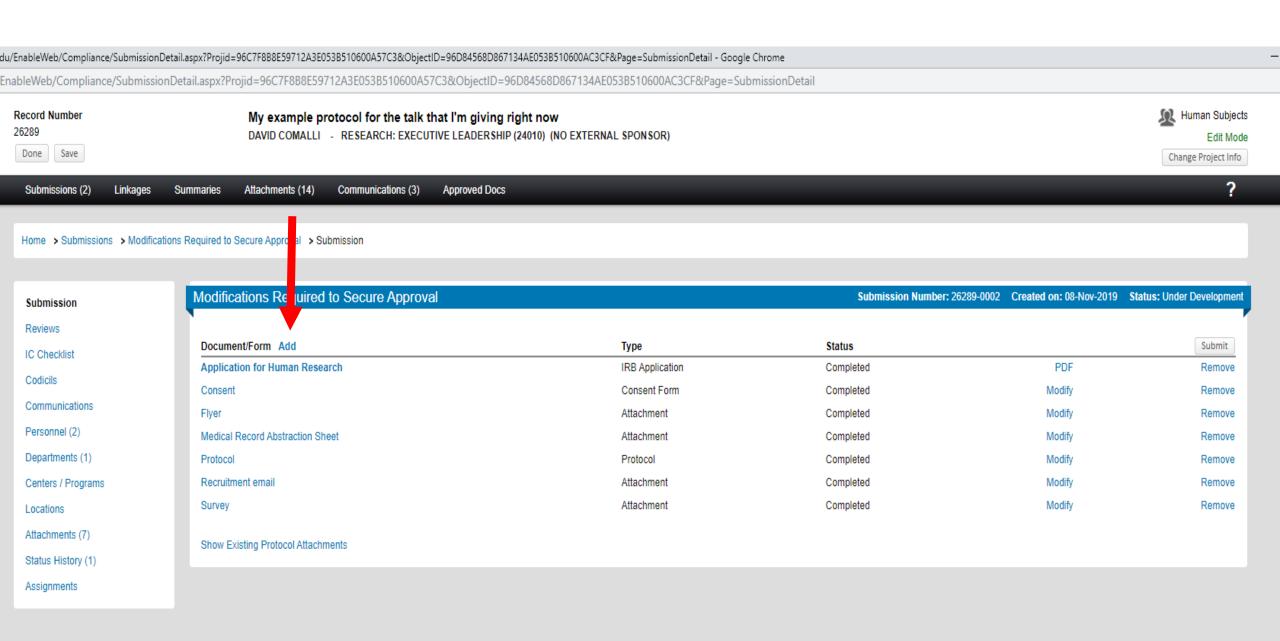
Attachments (7)

Status History (1)

Assignments

	Submission Number: 26289	9-0002 Created on: 08-Nov-2019	Status: Under Developmen
Type	Status		Submit
IRB Application	Completed	PDF	Remove
Consent Form	Completed	,	Remove
Attachment	Completed	Modify	Remove
Attachment	Completed	Modify	Remove
Protocol	Completed	Modify	Remove
Attachment	Completed	Modify	Remove
Attachment	Completed	Modify	Remove
	Consent Form Attachment Attachment Protocol Attachment	IRB Application Completed Consent Form Completed Attachment Completed Attachment Completed Protocol Completed Attachment Completed	IRB Application Completed PDF  Consent Form Completed Modify  Attachment Completed Modify  Attachment Completed Modify  Protocol Completed Modify  Attachment Completed Modify

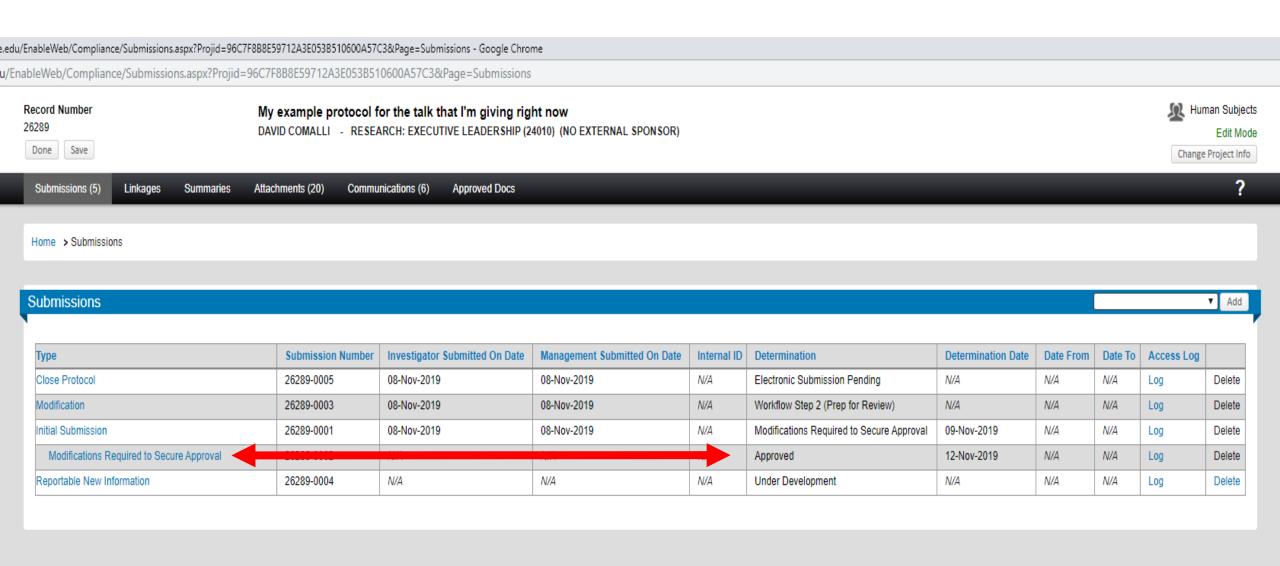
### Add the new (Tracked Changes and Clean versions) documents



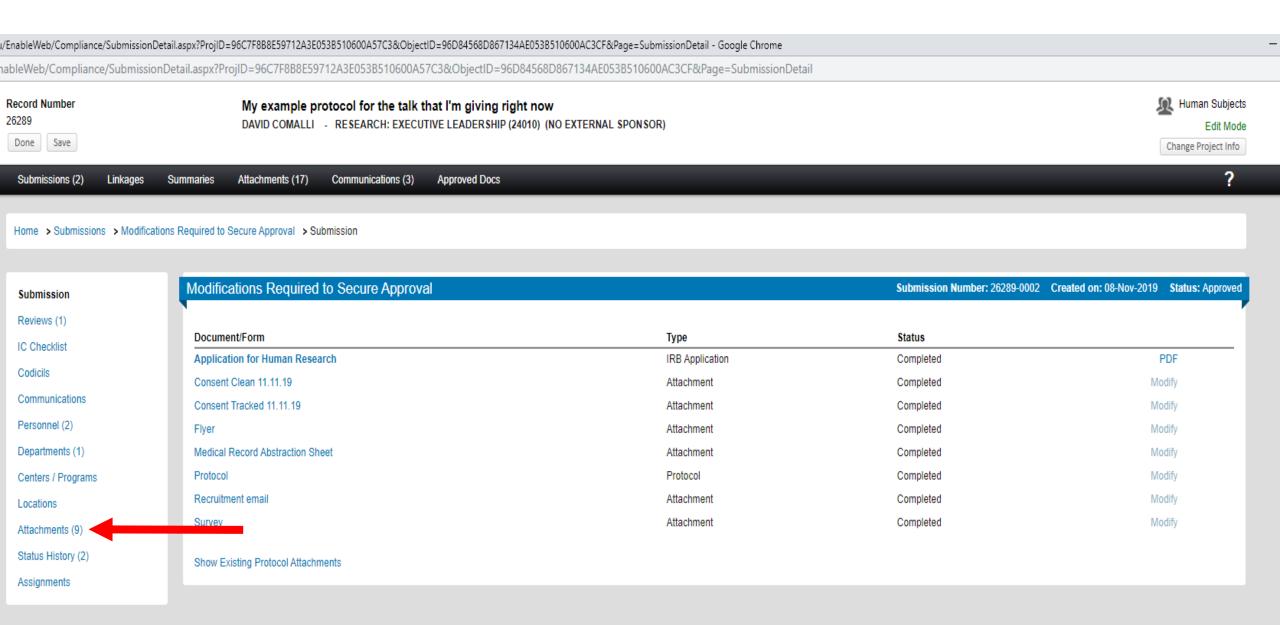
### Click "Submit" once all updated documents are submitted; Don't remove unchanged documents

du/Enable Web/Compliance/Submission Detail.aspx?ProjID=96C7F8B8E59712A3E053B510600A57C3&mark=3283227&WFTabID=16&rand=0.16045401324682573&Mode=EDIT&ObjectID=96D84568D867134AE053B510600AC3CF&Page=Submission Detail - Google ChromeEnableWeb/Compliance/SubmissionDetail.aspx?ProjID=96C7F8B8E59712A3E053B510600A57C3&mark=3283227&WFTabID=16&rand=0.16045401324682573&Mode=EDIT&ObjectID=96D84568D867134AE053B510600AC3CF&Page=SubmissionDetail Record Number Human Subjects My example protocol for the talk that I'm giving right now 26289 DAVID COMALLI - RESEARCH: EXECUTIVE LEADERSHIP (24010) (NO EXTERNAL SPONSOR) Edit Mode Done Save Change Project Info Submissions (2) Linkages Attachments (16) Communications (3) Approved Docs Home > Submissions > Modifications Required to Secure Approval > Submission Modifications Required to Secure Approval Submission Number: 26289-0002 Created on: 08-Nov-2019 Status: Under Development Submission Reviews Document/Form Add Type Submit Status IC Checklist Application for Human Research IRB Application Completed PDF Remove Codicils Consent Clean 11.11.19 Attachment Completed Modify Remove Communications Consent Tracked 11.11.19 Attachment Completed Modify Remove Personnel (2) Flyer Attachment Completed Modify Remove Departments (1) Medical Record Abstraction Sheet Attachment Completed Modify Remove Protocol Protocol Completed Modify Remove Centers / Programs Recruitment email Attachment Completed Modify Remove Locations Survey Attachment Completed Modify Remove Attachments (8) Status History (1) Show Existing Protocol Attachments Assignments

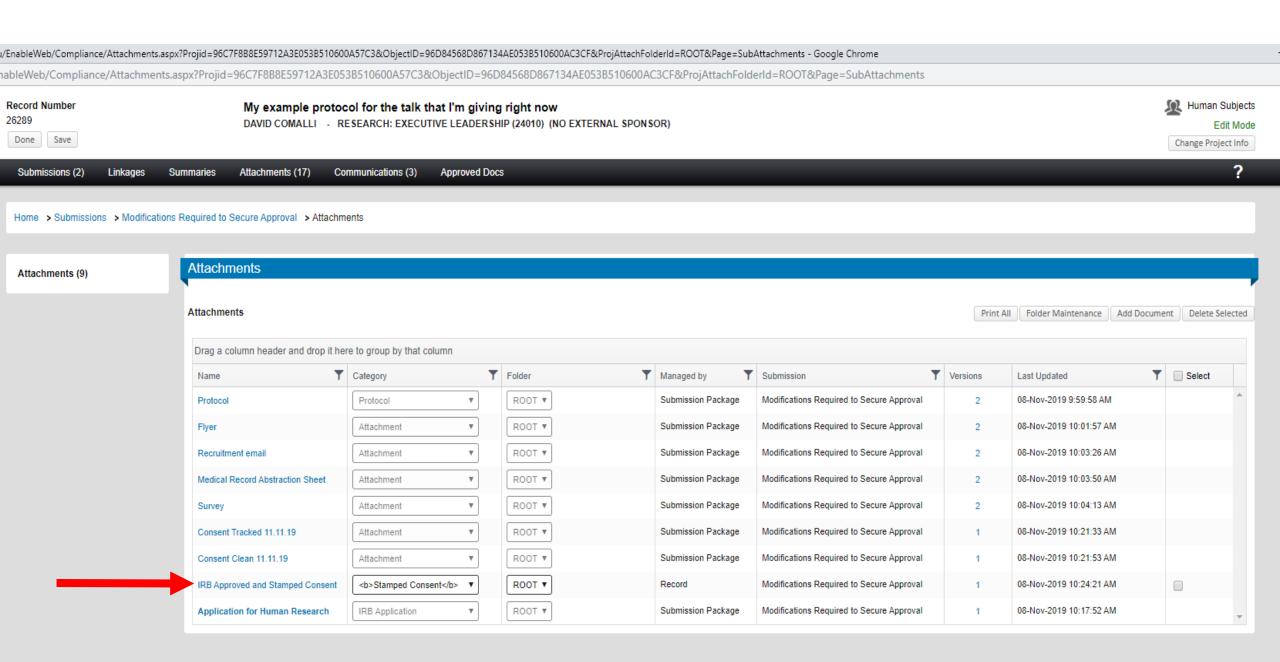
## After the submission is approved, retrieve stamped consent forms by going to the "Approved" submission



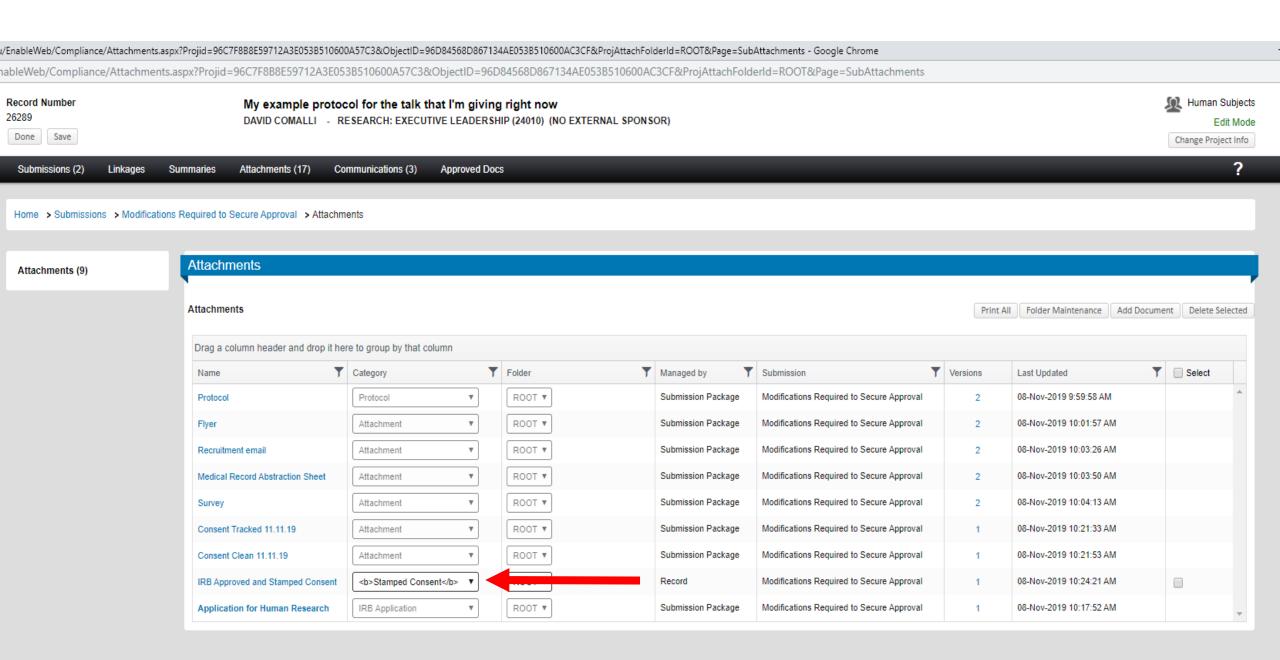
#### Click on the "Attachments" link within the submission



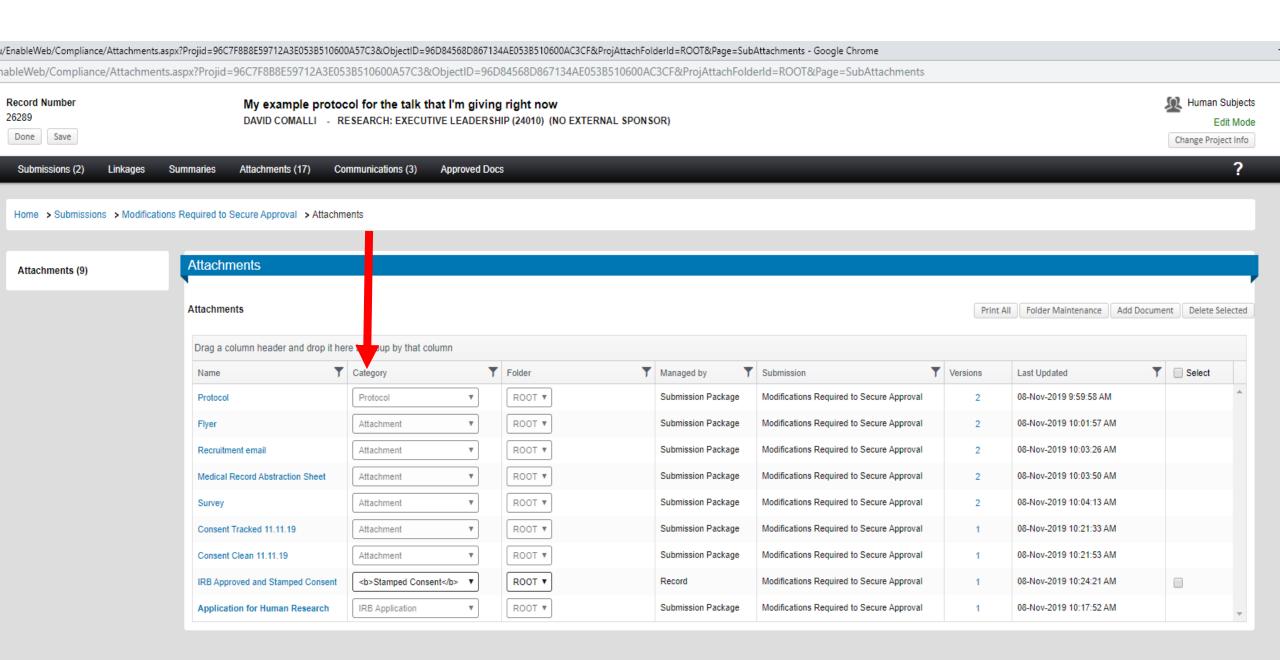
### Find the IRB Approved and Stamped consent(s)



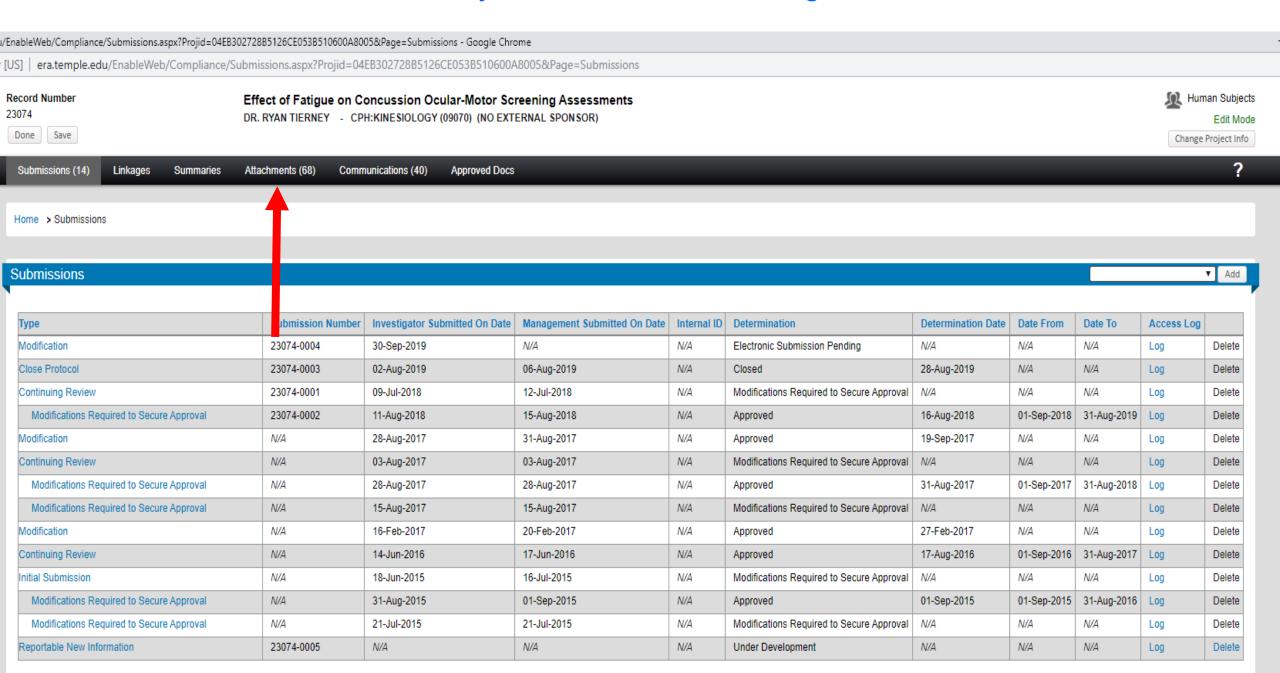
### They should be sortable by "Category," labeled as "<b> Stamped Consent </b>"



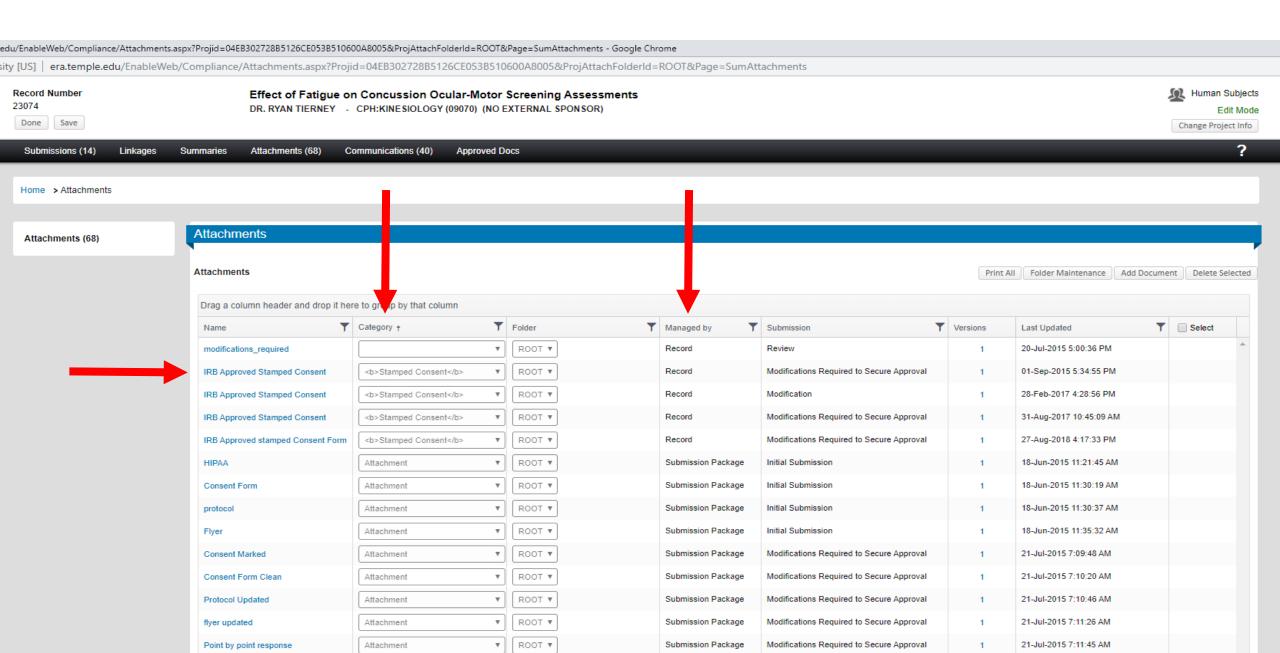
### Clicking "Category" will sort alphabetically; Clicking again sorts in the opposite direction



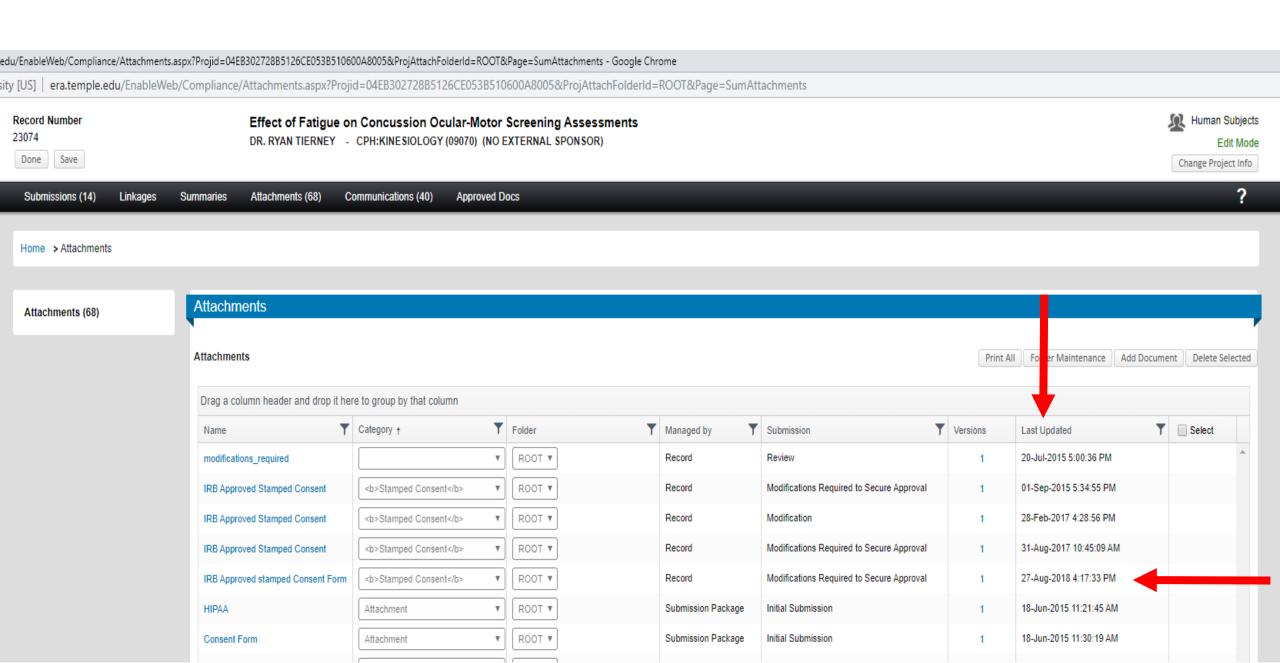
### All documents for the study can be viewed in the general "Attachments" tab



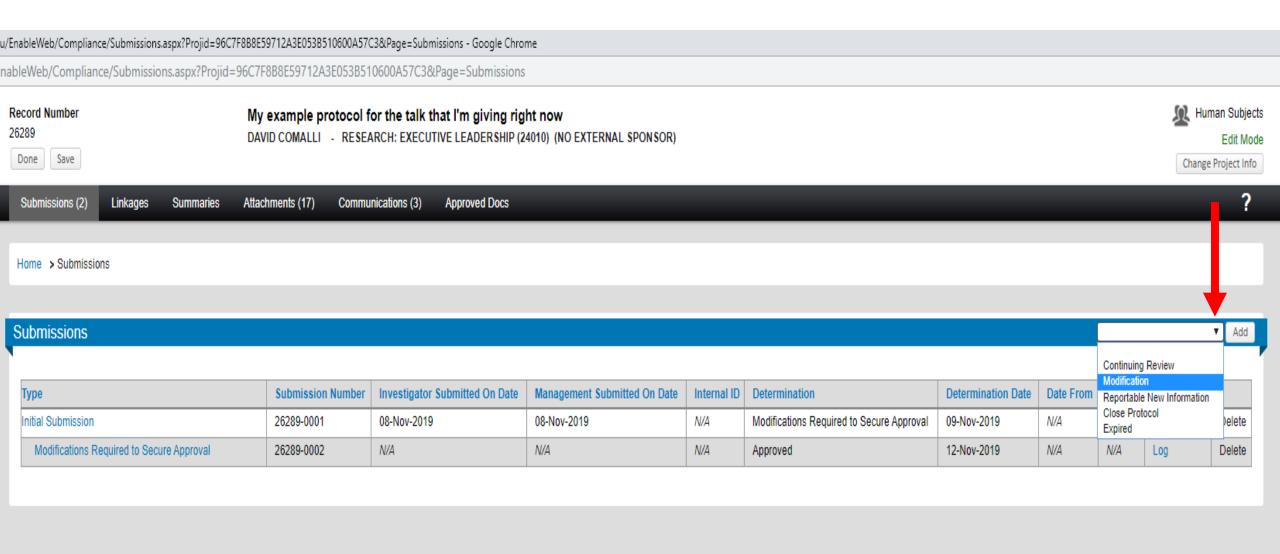
### Sort "Category" or "Managed by" to bring Stamped Consents to top (generally)



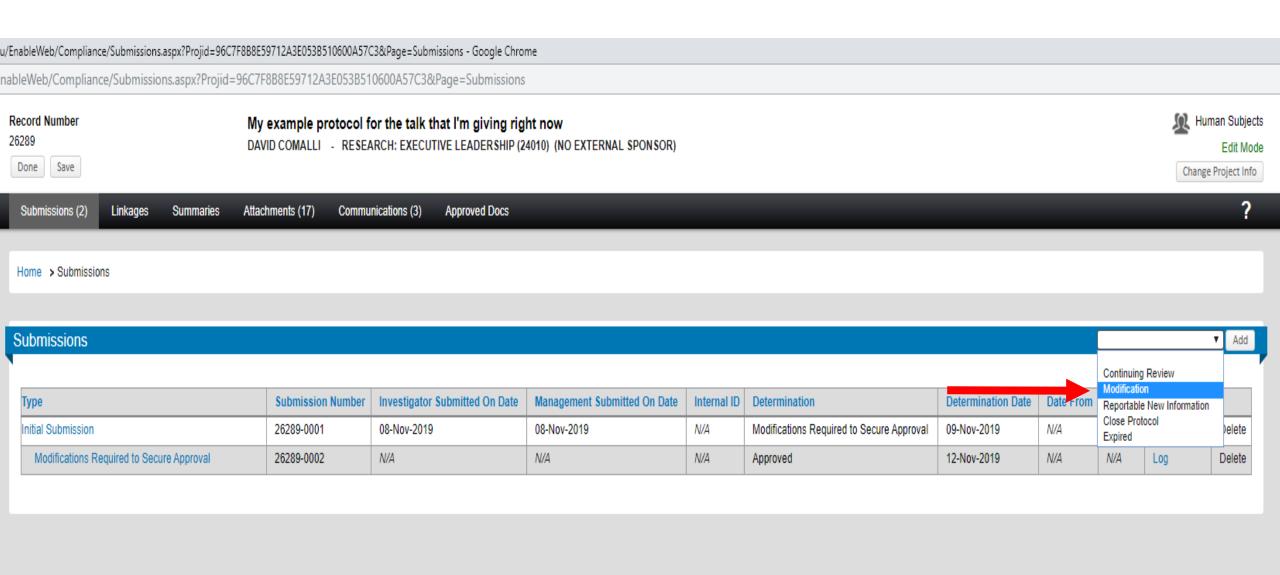
### Mind "Last Updated" to ensure the correct version is being downloaded



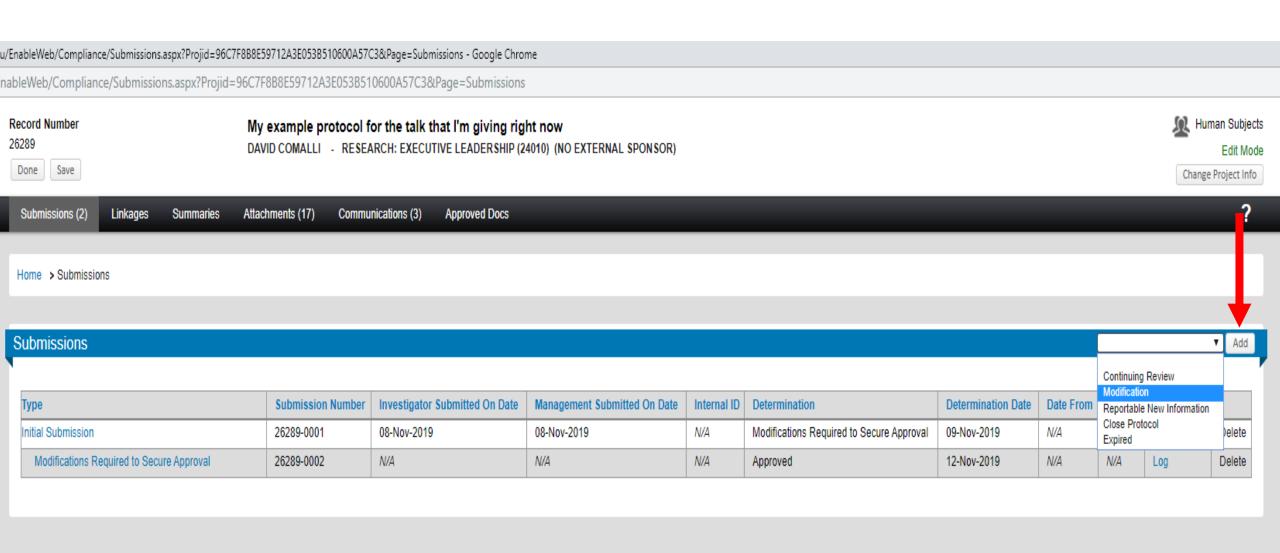
### Create another submission by clicking the dropdown menu on the "Submissions" page



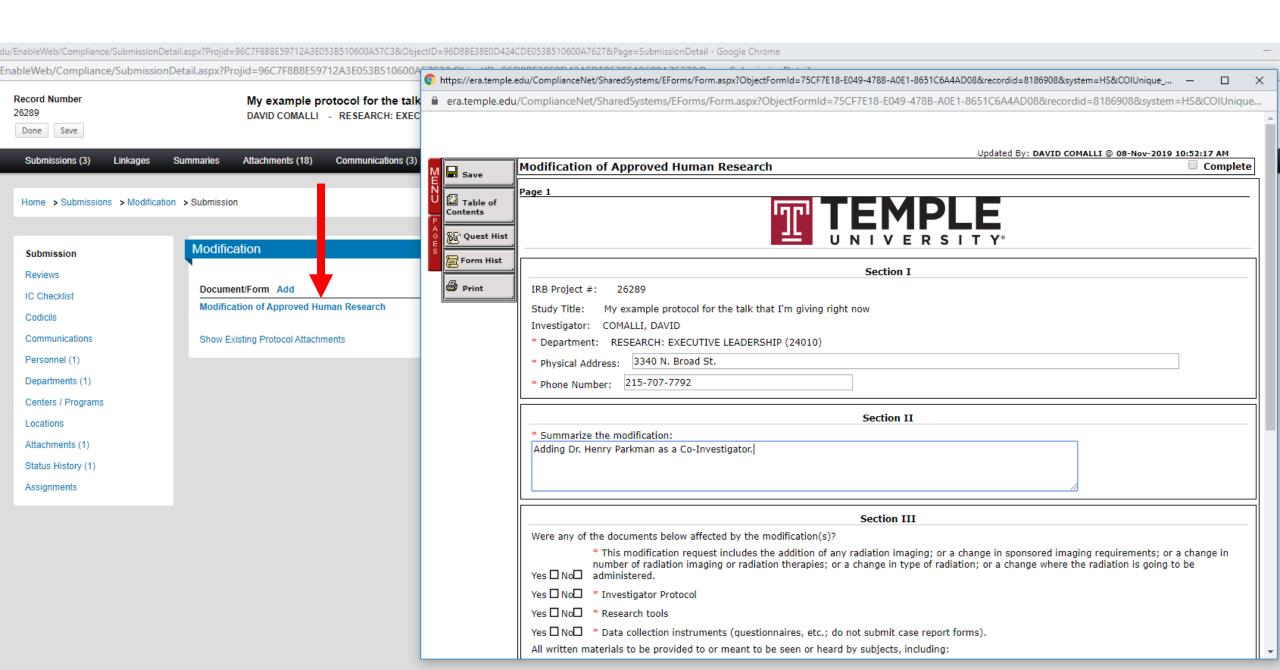
### Select the desired submission type; This example is creating a "Modification"



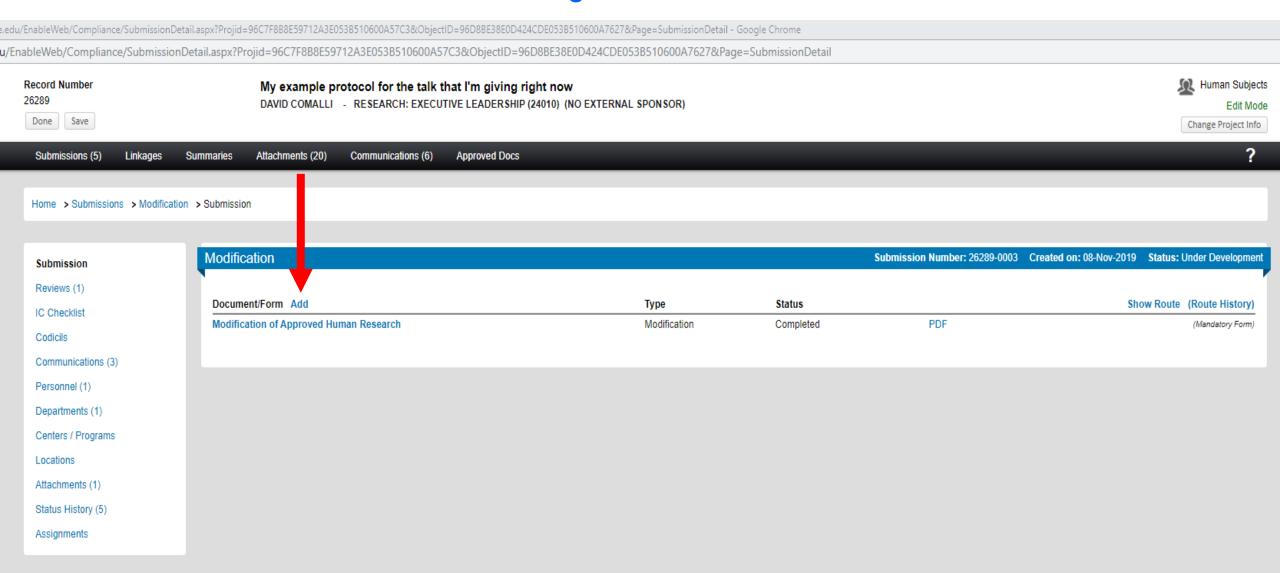
#### Click "Add"



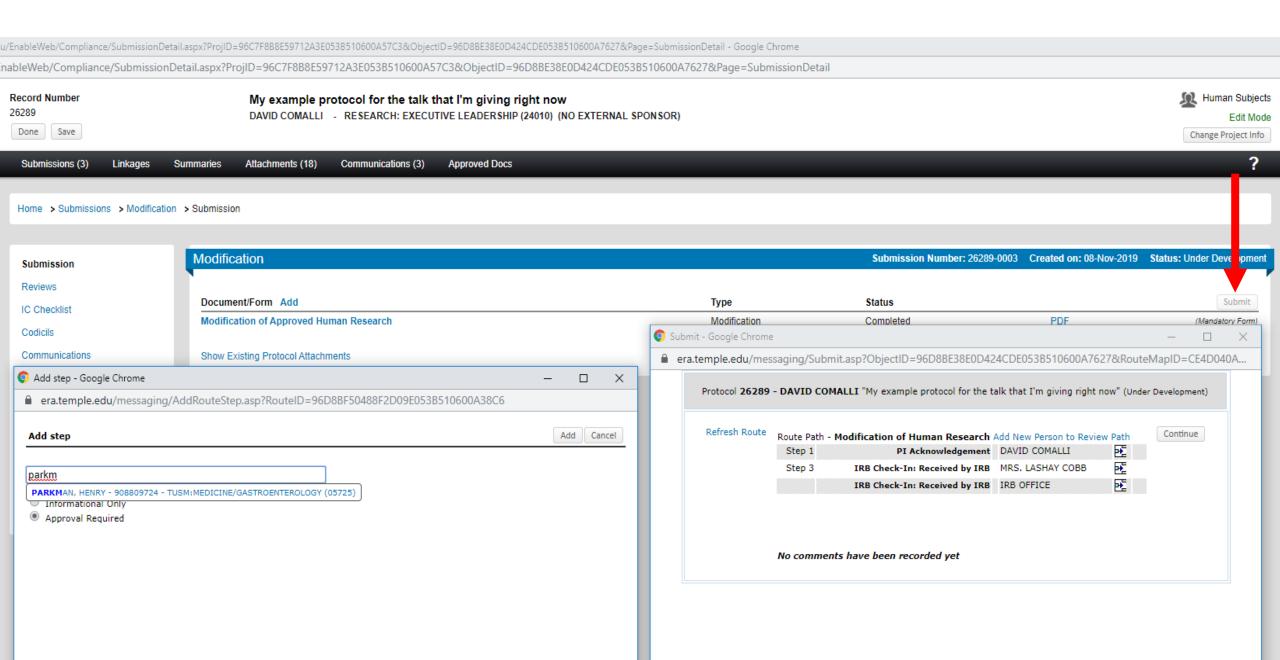
### Click and then complete the "Modification of Approved Human Research" eForm



### Click "Add" to add any additional documents; If changing approved documents, include tracked changes and clean versions



### When ready, click "Submit" and get to the approval route





### IRB@temple.edu

https://research.temple.edu/research-compliance/faqs-research-compliance

215-707-3390

