

## Communication among IRBs

When conducting multi-site research, it is important to establish communication between the IRBs of each participating site. Rutgers University follows specific criteria for deciding which institution's IRB should review the human subjects research protocol.

### **What criteria does RU consider when deciding which institution's IRB should review the human subjects research protocol?**

If the primary work is conducted at a Rutgers site, the protocol will be reviewed by the Rutgers IRB and if the primary work is conducted at another site that has an OHRP approved Assurance, that site's IRB will review the human subjects research protocol. Also, if one of the IRBs participating in a multi-site research are known to have a specific area of expertise but may not be the primary work site, consideration is given to having that IRB review the human subjects research protocol. It is still a requirement that all members participating in the research have received Human Subjects Certification. An [IRB Authorization Agreement Form](#) obtained from OHRP must be filled out and maintained in the records of both institutions and relevant documents provided to each institution per the terms of the authorization.

### **What are the communication policies RU follows when another institution serves as the IRB of record?**

It is the policy of RU to ensure timely communication between any institution that is serving as the IRB of record and the Office of Research and Sponsored Programs at RU. In the IRB Authorization Agreement, RU requires materials to be forwarded to the Sponsored Programs Administrator including all protocol related materials as provided by the PI, continuing review approval notices, protocol amendments and addenda, findings of audits and compliance actions, relevant minutes of IRB meetings, and notices of approval and closure. All communications are to be transmitted to the Sponsored Programs Administrator within two weeks of the IRB of record's actions. These communications are to clearly reference the protocol number, title, and PI and Co-PI. These conditions may also be put forth in a Memorandum of Understanding (MOU) between RU and the institution serving as the IRB of record.

The review and continuing oversight performed by the IRB of record will meet the human subjects protection requirements of Rutgers University's OHRP-approved Federalwide Assurance (FWA00003913).

The Rutgers University IRB remains responsible for ensuring compliance with the IRB of record's determinations and with the terms of its OHRP-approved Assurance.

When RU serves as the IRB of record for another institution, if applicable, the RU IRB forwards all protocol related materials as provided by the PI, continuing review approval notices, protocol amendments and addenda, findings of audits and compliance actions, relevant minutes of IRB meetings, and notices of approval and closure to the appropriate contact within 14 days.

**What is the procedures for multi-site communication when research is proposed that is a Phase III multi-site clinical trial?**

When research is proposed that is a Phase III multi-site clinical trial, Federal regulations require the establishment of a Data Safety Monitoring Board (DSMB). The RU IRB will also consider using a DSMB in Phase I and Phase II clinical trials, especially if those trials are multi-site. The Investigator should provide a data and safety monitoring plan in the research protocol submitted to the IRB for review that adequately protects the rights and welfare of subjects. However, as the majority of research projects conducted at RU are social-behavioral in nature, these procedures will likely not apply to most researchers.

When a DSMB is appointed, the RU IRB recognizes that it should not be functioning as the primary mechanism for data and safety monitoring and will not attempt to function as a data monitoring committee. It is the role of the RU IRB to review the proposed data and safety monitoring plan and determine if the proposed plan adequately protects human subjects (for more information see [Standard II-4.C](#)). It is the role of a DSMB to provide data and safety monitoring and to then make recommendations to the IRB through the investigator. Following is an excerpt from a [1999 NIH policy statement](#) regarding DSMBs:

“The DSMB’s summary report should provide feedback at regular and defined intervals to the IRBs. The Institutes and Centers should assure that there is a mechanism in place to distribute the report to all participating investigators for submission to their local IRB. For example, after each meeting of the DSMB, the executive secretary should send a brief summary report to each investigator. The report should...summarize the Board’s review of the cumulative toxicities reported from all participating sites without specific disclosure by treatment arm. It should also inform investigators of the Board’s conclusion with respect to progress or need for modifications of the protocol. The investigator is required to transmit the report to the local IRB.”

- In performing its role as a data and safety monitoring group, the DSMB should review the chart of each research subject at appropriate intervals for any side effects and tolerability to the investigational drug.
- The DSMB should also review any adverse event reports received by the investigators at each site involved in the study. Members of a DSMB will be more qualified to assess overall importance of adverse event reports because they have the resources to obtain detailed information that an IRB may not have access to and the DSMB will have access to all the adverse event reports across all sites involved in the study. For example, some research subjects may suffer a fatal stroke from a new investigational chemotherapy regimen for cancer at RU.

However, to make a decision about these reports, the IRB would need detailed information about the observed incidence of stroke in the study population independent of research participation and access to any other adverse event reports. A DSMB would have this information available.

- When reviewing protocols that involve multi-site clinical trials, the IRB should make sure provisions are made in the protocol for regular receipt of DSMB reports and the interval these reports should be received by the IRB. The IRB also requires the DSMB to review the data and safety monitoring plan proposed by the investigator and should provide documentation that they have read and agree with the data and safety monitoring plan.
- It is also the role of the DSMB to provide interim data analysis. The IRB may require that the investigator include in the research proposal the specific “stopping rules” or parameters that specify when and how research will be revised including the criteria for terminating the study based on interim data analysis. The DSMB should review unblinded data at predetermined intervals during the course of the study in order to determine if these criteria for terminating the study have been met. Following is an example taken from Amdur (2002):

“This multicenter trial will be monitored after every 12<sup>th</sup> patient, with a recommendation for termination if the accumulating data provide evidence that the conventional response rate does not exceed the 17% rate observed in historical experience by at least 13%, that is, and increase to a 30% conventional response rate...The trial will be recommended for termination if the probability is less than 5% that the new target response level of 30% is achieved, based on data accumulated after every 12<sup>th</sup> patient.

Providing stopping rules in the research application makes it much more likely that research being reviewed by the IRB will be approved.

#### REFERENCES:

AAHRPP II-8.A. The RRU has and follows policies and procedures for communication among IRBs, when appropriate, for research conducted at multiple sites (e.g. multi-site clinical trials, epidemiology studies, or educational surveys.)

AAHRPP II-8.B. The RRU has and follows policies and procedures for management of information obtained in multi-site research which may be relevant to the protection of research participants, such as reporting of unexpected problems or interim results.

Robert J. Amdur (2002). Provisions for Data Monitoring. In Institutional Review Board: Management and Function (Eds. Robert J. Amdur and Elizabeth A. Bankert). Sudbury MA: Jones and Bartlett Publishers, pp. 389-393.

McCutchan, Allen J. (2002). Data and Safety Monitoring. In Institutional Review Board: Management and Function (Eds. Robert J. Amdur and Elizabeth A. Bankert). Sudbury MA: Jones and Bartlett Publishers, pp. 303-305.

National Institutes of Health. NIH policy for data and safety monitoring, 10 Jun 1998. Access date 14 Nov 2004. World Wide Web <http://grants2.nih.gov/grants/guide/notice-files/not98-084.html>.

National Institutes of Health. NIH guidance on reporting adverse events to institutional review boards for NIH-supported multicenter clinical trials, 11 Jul 1999. Access date 26 Jan 2005. World Wide Web <http://grants.nih.gov/grants/guide/notice-files/not99-107.html>

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