CAMPBELL UNIVERSITY	**IRB SOP:** Conducting Multi-site (sIRB) Research and Investigator Responsibilities		
	NUMBER	APPROVED BY	EFFECTIVE DATE
	HSR-720	Miranda van Tilburg, PhD IRB Chair, IRB Office Campbell University	12/02/2020

Applies to Campbell faculty, faculty advisors, students and staff conducting or overseeing human subjects research.

Purpose

To define the scope of Campbell IRB oversight, to outline the responsibilities of principal investigators when participating in or leading multi-site research, and to describe information to be provided to the IRB regarding the oversight operations and practices which will be employed in the conduct of the multi-site project.

Background

In accordance with the Human Research Protection Plan, the IRB Office reviews and determines if it is appropriate to execute an Institutional Authorization Agreement (IAA) or an Individual Investigator Agreement (IIA) for either:

1. The Campbell University IRB to serve as the Single IRB (sIRB) or IRB of Record for a Multi-Site Project, Collaborative Project, or an individual investigator, in alignment with the requirements outlined in *IRB SOP: Conducting Multi-Site (sIRB) Research*.
2. The Campbell University IRB to cede IRB review to (i.e. rely on) an external IRB from another institution/organization, in alignment with requirements outlined in *IRB SOP: Conducting Multi-Site (sIRB) Research*.

Definitions

Clinical Trial: a research project in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of the interventions on biomedical or behavioral health-related outcomes.

Coordinating Site: The Coordinating Site will typically be the home site of the lead investigator for the entire project. For federally funded and/or FDA[1]-regulated multi-site projects, the “primary awardee” or “grantee institution” will typically be designated as the Administrative or Coordinating Site. The Campbell IRB requires the project to identify a nominal lead investigator by name and site when a multi-site project is being led or directed by two or more lead investigators (e.g. a leadership committee).The Coordinating Site is responsible for overall data management, monitoring and communication among all sites, and general oversight of conduct of the project.

Data Coordinating Site: Some projects designate one site to specialize in (among other things) receiving, verifying, and storing results from all sites.

Engaged in Research: An institution becomes "engaged" in human subjects research when its employees or agents (all individuals performing institutionally designated activities or exercising institutionally delegated authority or responsibility):

1. intervene or interact with living individuals for research purposes;
2. obtain individually identifiable private information for research purposes;
3. obtain informed consent from human subjects; or
4. receive Health and Human Service (HHS) funds even when all activities are carried out at another institution or by employees of another institution. Determinations on Campbell University's engagement in human subjects research are made by Campbell IRB Office.

Federalwide Assurance (FWA): The only type of assurance currently accepted and approved by the Office of Human Research Projection (OHRP). Through the FWA, an institution commits to HHS that it will comply with the requirements in the HHS Protection of Human Subjects regulations at 45 CFR part 46.

Individual Investigator Agreement (IIA): An institution holding an OHRP-approved FWA may extend the applicability to cover two types of collaborating individual investigators when the project is federally supported:

1) collaborating independent investigator who is not otherwise an employee or agent of Campbell University, is conducting collaborative research activities outside of Campbell University, and is not acting as an employee of any institution when conducting the research;

2) collaborating institutional investigator who is not otherwise an employee or agent of Campbell University, is conducting collaborative research activities outside of Campbell University, and is acting as an employee or agent of an institution that does not hold an FWA.

This extension is documented using the Individual Investigator Agreement (IIA). The Campbell IRB Office will make the final decision regarding whether an IIA is appropriate for a specific case.

Multi-Site Project: The Campbell IRB defines a multi-site project as a human subjects research project that will be initiated at more than one location other than or in addition to Campbell University. Examples of multi-site projects include:

- A project conducted at Walgreens or another pharmacy.
- A project conducted at a local medical office/center.
- A project conducted at both University of North Carolina and Campbell University.
- A clinical trial conducted at forty different sites in the United States, even though the non-Campbell University sites may pursue IRB review independently.
- A project conducted at a social services agency in Harnett County, or in a local neighborhood.

Participating/Performance Site: A participating site is one at which staff are engaged in the conduct of research (see definition of 'engaged"). A participating site is the actual place where

the research activity takes place (e.g., clinic, hospital, community center). The participating site's location may be different from the location where the IRB review takes place.

Reviewing IRB/IRB of Record: The IRB responsible for review of research involving a participating site. If the Reviewing IRB for non-Campbell University sites is the Campbell IRB, a Reliance Agreement must be in place. See *IRB SOP: Reliance Agreements for Multi-site Projects*.

Rely: Also known as “defer or cede.” An institution agrees to transfer oversight of a project under its jurisdiction to another IRB. CU requires a signed Agreement to be in place prior to final IRB approval of the project. See *IRB SOP: Reliance Agreements for Multi-site Projects*.

Safety Monitoring Site: Some projects designate a person, committee, or board (e.g. “Data Safety Monitoring Board”) to specialize in monitoring, reviewing, and analyzing adverse events and unanticipated safety/rights/welfare problems for the entire project.

Campbell University IRB Oversight: The Campbell IRB defines its scope of oversight jurisdiction to include:

- Human subject research activities conducted at Campbell University.
- Human subject research activities conducted or initiated by Campbell University employees or agents at any other site.
- Human subject research activities that make use of any Campbell University resources other than faculty or employee time commitment.

All projects meeting these criteria must be submitted to the Campbell IRB for review and approval. If an investigator wishes Campbell University to rely upon a non-Campbell University IRB for review and approval of a project, consult the *IRB SOP: Reliance Agreements for Multi-Site Projects*.

Procedures and Principal Investigator Responsibilities

Requesting reliance/deferral: When requesting that Campbell University rely upon another IRB for review of a project or that an outside institution, agency, or other entity rely upon the Campbell IRB, an investigator must follow the procedures outlined in the *IRB SOP: Reliance Agreements for Multi-Site Projects*.

Sub-contracts or service agreements: When different institutions are conducting portions of a single federally funded non-exempt human subjects research project, a portion of the project on the Campbell University campus that is sub-contracted or which has a service agreement cannot be considered exempt. The entire project must meet one or more of the exemptions in order for the exemptions to apply to a sub-contracted or service agreement portion of a project.

IRB Submission

For multi-site projects, the IRB must review information about what research activities will be conducted on this campus and information about the entire project in order to understand how the Campbell University Principal Investigators' (PIs') activities fit within the entire project. The breadth of information needed by the IRB is dependent upon the PI's role and will increase as the PI's responsibilities to the entire project increase. The list of required information below is in addition to that required for all new projects. See *IRB SOP: New Protocol Submission*.

In the following cases, the IRB application must provide a CV for the lead investigator from each site and a narrative in the *Research Plan* that describes the resources available to the investigator:

1. Campbell IRB is the Reviewing IRB for another site; or
2. The multi-site project is investigator-initiated and the Campbell University investigator is the lead PI for the entire project; or
3. The Campbell University investigator is lead PI for the entire project and the project is federally funded and/or FDA[1] regulated.

1. For all multi-site projects, the IRB application must include:

a. Identification of one lead investigator by name and corresponding lead site;
b. A description of research activities that will take place at Campbell University;
c. A protocol or research plan document that describes the entire project;
d. Operating or coordinating center procedure manuals to be used, if applicable;
e. If the same protocol document is disseminated to all sites, a description of what parts of the protocol will/will not be conducted at Campbell University, e.g. not enrolling minors when the project protocol includes adults and minors, not conducting a subproject as described in the project protocol;
f. For more than minimal risk projects, an explanation of the plan for continuing oversight of subject safety, name of individual at Campbell University responsible for evaluating and responding to subject complaints, plan for how the coordinating center will disseminate information to sites regarding UPIRSOs, new information, and changes in the project protocol or consent form.

2. For projects where the Campbell University PI is the Principal Investigator for the entire non-exempt project:

The scope of Campbell IRB review will include:

a. The Campbell campus site and Campbell project team activities;
b. Every subcontracted or component site and that site's staff; and
c. The leadership, management, communication, and safety monitoring plans for the integrated whole.

Therefore, in addition to information listed in **section 1**, the *New Protocol Submission Form, Research Plan* and the proper *IRB Agreement Request Form* should clearly describe the duties

and activities of the Campbell University PI as Principal Investigator of the entire project, including:

a. Description of the Principal Investigator's responsibilities;
b. A list of all sites;
c. Description of research activities that will take place at Campbell University and those that will take place at each outside site;
d. The name of the site where data will be aggregated, if there is a data coordination site;
e. Communication plan, including communicating changes to the protocol, interim analysis results, etc. to all performance sites;
f. Method for assuring all sites have and are using the most current version of the protocol and consent form;
g. Site where safety monitoring will be centralized (if applicable) with information about how to communicate with the committee/board;
h. Monitoring plan appropriate to the nature of the project for receiving and evaluating subject complaints and protocol events, unanticipated problems involving risks to subjects or others and protocol deviations from performance sites;
i. Process for reporting all UPIRSOs from any site to appropriate institutional and federal officials, as appropriate;
j. If federally funded or FDA[1] regulated, the Campbell University lead PI must provide:
    - Documentation that each performance site has an Federalwide Assurance (FWA) with Office of Human Research Projection (OHRP) on file or documentation of IRB approval at each site;
    - Information regarding the engagement of any staff at any non-Campbell University campus site who is:
        - An employee of an institution without an FWA, or
        - Employed by an institution that has not executed a subcontract with Campbell University, or
        - Not under the jurisdiction of an IRB that has approved their project activities.

3. For projects where Campbell University is the Coordinating Site or other sites are relying upon the Campbell IRB for review:

In addition to the information listed in **sections 1 and 2** above, the *New Protocol Submission Form, Research Plan* and the proper *IRB Agreement Request Form* should describe the duties and activities of Campbell University as the Coordinating Site including:

a. Description of the Coordinating Site's leadership structure and responsibilities;
b. Plan for ensuring the protocol and consent form have been reviewed and approved at each site before the project begins at that site;
c. Plan for assuring that informed consent is obtained in accordance with Health and Human Service (HHS) regulations;
d. Plan for continuing oversight of the project including: maintaining confidentiality of data, evaluating and responding to subject complaints, ensuring protocol compliance and data

accuracy, evaluating problems and adverse events that arise during the project, communicating changes to the protocol, interim analysis results, etc. to all performance sites;

e. Plan for collection, management, and analysis of data from all sites;
f. When other sites are relying upon the Campbell IRB for review, the *New Protocol Submission Form, Research Plan* and the proper *IRB Agreement Request Form* must list key personnel at the other sites as staff.

4. Community-based Multi-site Projects

a. For projects for which Campbell University PI is the Principal Investigator for the entire project, the IRB application should include:
    - List of all sites;
    - Description of research activities that will take place on the Campbell University campus and those that will take place at community-based sites;
    - Description of who will conduct research activities on the Campbell University campus and who will conduct those at community-based sites. These should be listed in the *New Protocol Submission Form, Research Plan* and the proper *IRB Agreement Request Form* as personnel.
    - A protocol that describes the entire project, in addition to the research plan, if applicable;
    - Recruitment procedures at each site and who will be conducting these;
    - Procedure for obtaining informed consent at community-based sites, if applicable, and who will be conducting the process;
    - Name of individual at Campbell responsible for evaluating and responding to subject complaints and reporting UPIRSOs;
    - Plan for how new information and changes in the project protocol or consent form will be communicated to all sites;
    - If not federally funded, a Letter of Support from the community-based sites unless the site has already provided this document as part of an award application.
b. For federally funded projects for which Campbell University is the awardee or Coordinating Site, the IRB application must include all information listed in **section 2**.
c. For federally funded projects directed or initiated by an Campbell University PI and for which a community-based organization receives federal funding via a subcontract or other mechanism, the organization must have an FWA or contact the Campbell IRB Office to discuss the possibility of an Individual Investigator Agreement. See *IRB SOP: Reliance Agreements for Multi-site Projects*.

5. Principal Investigator responsibilities when conducting multi-site projects

As with any project, the PI bears ultimate responsibility for safeguarding the rights and welfare of humans participating in the project, whether the PI of the entire project or of the

local site only. See *IRB SOP: Responsibilities for Principal Investigators Conducting Human Subject Research* and *IRB SOP: Reliance Agreements for Multi-site Projects*.

6. Continuing Review and Reporting Responsibilities for Multi-Site Projects

Where there are multiple sites but the CU IRB is reviewing for research conducted on the Campbell University campus only:

a. The Campbell University PI must provide a report on the progress of the project to both the Campbell IRB and the Principal Investigator for the entire project.
b. The Campbell University PI must report reportable events to the Campbell IRB as outlined in the *IRB SOP: Requirements for Reporting to the IRB*.

IRB review has been ceded to an outside IRB:

a. The Campbell PI must report on the progress of the project to the Principal Investigator for the entire project and the reviewing IRB per their policies.
b. UPIRSOs, serious and/or continuing non-compliance, and protocol violations must be reported to the reviewing IRB per their policies. The Campbell IRB Office must also be notified so that institutional responsibilities can be fulfilled.

Campbell IRB is reviewing for outside institutions/agencies or Campbell University PI is the Principal Investigator for the entire project:

a. The Campbell University PI is responsible for gathering progress report information from the other sites, collating information, and providing both a status report for each site as well as a report on the progress of the overall project in the Continuing Progress Report to the Campbell IRB.
b. Reportable events must be submitted to the Campbell IRB as outlined in the *IRB SOP: Requirements for Reporting to the IRB* regardless of where the event occurs.

7. Other Federal Agency Requirements

For projects which are supported by or receive funding from the Department of Defense (DoD) or a component of the (DoD):

a. Investigators conducting multi-site research must indicate that a formal agreement (Memorandum of Understanding or other Agreement) between organizations which specifies the roles and responsibilities of each party has been executed.

References

45 CFR 46
IRB SOP: New Protocol Submission
IRB SOP: Reliance Agreements for Multi-site Projects
IRB SOP: Requirements for Reporting to the IRB
IRB SOP: Responsibilities for Principal Investigators Conducting Human Subject Research
Guidance: Research Plan Guidance Document

[1.] As of signing of this SOP, the Campbell University IRB's Federalwide Assurance does not allow for FDA regulated human subjects research to be reviewed or approved by the Campbell IRB.