



Evaluation of the Federated Model of IRB Review of the National Children's Study (NCS) Vanguard Phase

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Overview of Presentation



- Overview of Federation Model as implemented in the NCS Vanguard Phase (NCS is a minimal risk research per 45 CFR §46.404)
- Structure of the Federation Model of Multisite IRB Review
- Implementation & Challenges
- Formative Evaluation: Research Questions and Status
- Resources for Developing a Federated IRB
 - Generic Federation of IRBs Toolkit

What is the mission of the Federation of NCS IRBs?



The mission of the Federation IRB is to maintain the highest ethical and regulatory standards in the review and oversight of the National Children's Study while minimizing duplicative effort among IRBs across multiple Study sites.

Brief History of the Federation Model of IRB Review



- The Federation of NCS IRBs is modeled after an approach to centralized review for multi-site studies proposed by the Pediatric Ethics Subcommittee of the Clinical and Translational Science Awards (CTSA)
- The Federated model was first presented to the Secretary's Advisory Committee on Human Research Protections (SACHRP) during its July 2009 meeting and an update was provided during the October 2010 meeting
- Federation model MOU and compact have been reviewed by OHRP
- This model of IRB review of multi-site studies will be implemented as a pilot effort with institutions participating in the NCS as well as the possibility of additional institutions with CTSA awards and NICHD networks

What are the guiding principles for the Federated Model?



- Trust: Shared commitment to protection of NCS participants
 - Codified in Federation Compact
- Transparency & Communication: Determinations and documentation are shared across all reviewing IRBs
- Flexibility: Level of participation in Federation IRBs is determined by each local FWA holding institution at a given Study Location.
 - Tiers of participation specified in Memorandum of Understanding (MOU)
- Coordination: The Federation is managed by the NCS Federation IRB Operations Center within the NCS Program Office
 - Operations center creates submission packages, FAQs, standard operating procedures, templates

Tiers of Participation in Federation of NCS IRBs



Tier*	Review Responsibilities of Local IRB	Review Responsibilities of Lead IRB	IRB of Record (NICHD or Local IRB)	MOU Required (Y or N)
1 Reliance on NICHD IRB as IRB of Record	<ul style="list-style-type: none"> • Communication of local context issues to NICHD IRB via NCS IRB Operations Center. 	<ul style="list-style-type: none"> • Initial reviews • Continuing reviews • Protocol amendments initiated by NCS Program Office 	NICHD	Yes
2 Facilitated or full local review	<ul style="list-style-type: none"> • Review of materials (initial reviews, amendments, continuing reviews) approved by NICHD IRB • Communication of local context issues to NICHD IRB via NCS IRB Operations Center • Local implementation review and oversight • Protocol amendments initiated by local Principal Investigator (if local IRB is IRB of record) • Unanticipated event reporting to OHRP • Serious Adverse Events • DMC (Data Monitoring Committee) reports 	<ul style="list-style-type: none"> • Protocol amendments initiated by local Principal Investigator** • Serious Adverse Events** • DMC (Data Monitoring Committee) reports • Unanticipated event reporting to OHRP** 	Local IRB and NICHD IRB	Yes
3 Reliance on local review	<ul style="list-style-type: none"> • Review of materials (initial reviews, amendments, continuing reviews) approved by NICHD IRB • Local implementation review and oversight • Protocol amendments initiated by local Principal Investigator (if local IRB is IRB of record) • Unanticipated event reporting to OHRP • DMC (Data Monitoring Committee) reports • Serious Adverse Events • DMC (Data Monitoring Committee) reports 		Local IRB	Yes

*Adherence to principles in Compact required for all tiers; **For Tier 1 institutions only

Evaluation of Federated IRB Initiative: Study Design



- Purpose: To learn about the performance of the Federation Model as a whole.
 - Refine and improve the operation of the model
 - Inform development of “alternative models of IRB review”
- Methodology:
 - Qualitative Data Collection - Interviews with key stakeholders (n=129)
 - Quantitative Performance Data - Review of characteristics of NCS IRB submissions across all Federation members (n=500 or more submission events)
 - Document Review - IRB Approval Letters

Evaluation of Federated IRB Initiative: Selected Research Questions

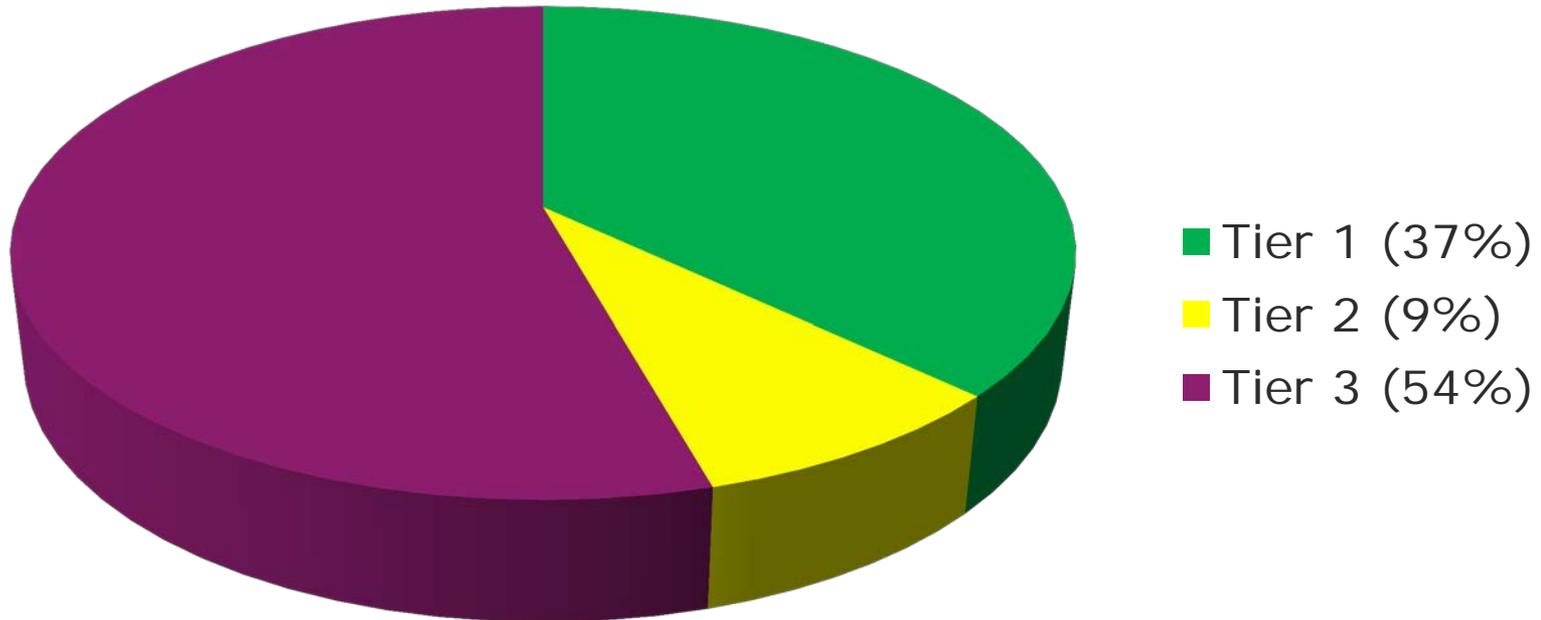


- What proportion of centers choose some form of reliance on the NICHD IRB?
- What are reasons for and barriers to participation in the Federation?
- What strengths and weaknesses do stakeholders perceive in the function of the Federation to date?
- What kinds of questions and stipulations have been raised by reviewing IRBs across Federation member institutions?
- Is there variation in IRB approval turn around time by Tier?
- For institutions who switched from local IRB review to Tier 1 or Tier 2, has Federation membership been associated with variation in approval turn around time?

Preliminary Findings: Study Center Tier Enrollment



Tiers of Membership in Federation of NCS IRBs as of July 22, 2011



N=35 Study Centers Participating in National Children's
Study Vanguard Phase

Status of Qualitative Data Collection



Study Center Role	Invited (n,%)	In process (n,%)	# Scheduled (n,%)	# Completed (n,%)
PI	34	1 (3%)	1 (3%)	32 (94%)
IRB Chair	32	18 (56%)	3 (9%)	9 (28%)
Study Coordinator	31	8 (26%)	0 (0%)	21 (68%)
IRB Lead/ Regulatory Affairs Coordinator	32	4 (13%)	2 (6%)	26 (81%)
Column totals	129	32 (25%)	6 (5%)	88 (68%)

Preliminary Findings 1: Anecdotal Data from Implementation of Federation of NCS IRBs



- Positive response from most NCS Study Center Institutions and principal investigators
- Length of NICHD IRB review time is a key factor for institutions interested in this approach
- Institutions participating in NCI Studies reviewed by the NCI CIRB or Pediatric CIRB seem more comfortable with Tier 1

Preliminary Findings 1: Anecdotal Data from Implementation of Federation of NCS IRBs



- AAHRPP Accreditation status has been a barrier for some institutions in establishing a reliance on the NICHD IRB
- Local research context review seen as burdensome by relying institutions, increases submission approval time, differing interpretations of OHRP 1998 local research context guidance
- Need for Operations Center to coordinate Federation, development of SOPs describing functioning of each Tier

Resources



- The Federation of IRBs Toolkit
 - Customizable materials that are required for creating and executing memorandums of understanding necessary to establish a Federation of IRBs that works collaboratively to centralize high quality human subject protections review for multi-site research protocol(s)
- Please direct inquiries about the Federation of IRBs Toolkit or the Federation of NCS IRBs to Steven Hirschfeld (hirschfs@mail.nih.gov) or Julia Slutsman (slutsmaj@mail.nih.gov)