



# WISCONSIN

UNIVERSITY OF WISCONSIN-MADISON

## RELIANCE MANUAL

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## **SCOPE**

Throughout this document “institution” refers to the University of Wisconsin-Madison. The institution’s IRB also serves as the reviewing IRB for University Hospital and Clinics (UWHC) so the information in this manual applies to human research conducted at the institution and UWHC. For information on UWHC affiliates (e.g., UnityPoint Health-Meriter, Swedish American) and VA reliance issues, see the “Other” section below.

## **Purpose of This Manual**

This document, [HRP-806 - RELIANCE MANUAL](#), is designed to guide you through policies and procedures related to human research overseen by the institution’s IRBs when it serves as the reviewing IRB for external individuals or institutions. This manual also provides guidance on when the institution relies on an external IRB.

Along with this manual, we encourage you to review current Human Research-related policies, SOPs, Worksheets, Checklists, and Templates located in the [Human Research Protection Program \(HRPP\) Toolkit Library](#). This manual includes references to the relevant documents throughout. To ensure you are always referencing the most current version of Toolkit and related documents, please access them in real time from the Toolkit Library rather than downloading and storing them on your computer.

## **Reliance and Navigation Team (RELIANT)**

The HRPP Reliance and Navigation Team (RELIANT) assists researchers with collaborative research issues, including single IRB review, ceding IRB review, and working with external personnel. We facilitate the process for executing reliance agreements when needed as well as supporting researchers working with a commercial IRB or the NCI CIRB. We also assist study teams with navigating the institutional requirements outside the IRB review process that may apply to their study. Collaborative research issues and reliance arrangements can be complex, so we encourage you to consult with us ([irbreliance@wisc.edu](mailto:irbreliance@wisc.edu)) early in your grant preparation and/or study design process.

## **UW-MADISON AS REVIEWING IRB OR SINGLE IRB**

### **Single IRB Review Requirements**

- *NIH*
  - All sites participating in multi-site studies funded by NIH must use a single IRB to review these studies. The NIH single IRB policy became effective in January 2018. This policy applies to the domestic (not international) sites where each site will conduct the same protocol involving non-exempt human research, whether supported through grants, cooperative agreements, contracts, or the NIH Intramural Research Program. It does not apply to career development, research training or fellowship awards.
  - If you plan to submit a grant proposal to NIH for a multi-site study, you will need to include a letter of support from the institution that will serve as the sIRB. See “Letter of Support” section below for more information.
- *Common Rule*

- [The revised Common Rule](#) – the primary federal regulations governing human subjects research – now requires that federally funded, multisite studies that are not exempt use a single IRB review model. Studies to which the sIRB mandate applies are:
  - Not exempt;
  - Federally funded;
  - Multisite, defined as sites engaged in non-exempt human subjects research within the United States; and
  - Not otherwise legally prohibited from using a single IRB.
- If the sIRB mandate applies to your study, a single reviewing IRB will need to be identified and all sites involved in the study will need to cede IRB review to that IRB. This may impact the kind of application you need to submit to a UW-Madison IRB as well as how long it may take to get IRB approval for all study sites. Please contact RELIANT as soon as you begin planning a multi-site study that may require sIRB review so we can assist you in identifying the best single IRB option for your study.

## Letter of Support for Federal Grants

All sites participating in multi-site studies involving non-exempt human research funded by NIH are [required](#) to use a single IRB. As part of the grant application process, NIH requires study teams to include a single IRB review plan. As part of this plan, NIH requires a letter of support from the proposed IRB of record. RELIANT will provide these letters of support if UW-Madison will serve as the reviewing IRB.

If the lead PI will be from UW-Madison, you should reach out to RELIANT before the grant application is submitted to get our assistance with:

- determining which sites may be engaged in human research
- putting together single IRB information for your grant application, including understanding what a communication plan should include
- identifying the best single IRB option for your study (which may not be UW-Madison)
- budgeting for IRB review (if applicable)
- other implications of the single IRB review policy for the study team, such as additional roles and responsibilities

To obtain a letter of support for your grant application, please contact RELIANT at least one week prior to the submission deadline. Please attach a copy of the narrative portion of your grant application as well as a list of proposed study sites or external individuals.

## Engagement Determination

IRB oversight is required for UW-Madison or any other sites when they are determined to be engaged in human research [per federal guidance](#). Using this guidance to assess whether your study activities and/or those of any collaborators or external sites are engaged in human research can be challenging. We encourage you to contact RELIANT for assistance in determining whether UW-Madison and/or any external sites are engaged in human research before considering any sIRB arrangements.

Please keep in mind that interpretations of engagement guidance can vary across institutions. While RELIANT can assist you in making preliminary engagement determinations for sites or individuals not

associated with an IRB, sites with an IRB will need to consult with their own IRB to determine whether they are engaged in human research.

## Exemptions

. Federal single IRB review requirements only apply to non-exempt studies, therefore UW-Madison is not required to provide IRB oversight for external sites or personnel involved in exempt research. While UW-Madison/UWHC study teams are responsible for ensuring external personnel are appropriately trained to conduct research activities for exempt studies, these personnel do not need to be listed on the study team pages in the IRB application. The role of external personnel in the study, however, should be described in the IRB application.

Before external personnel can participate in a project or study determined to be exempt by the UW-Madison IRBs, they must do the following:

- If the external personnel are affiliated with an organization (e.g., university, hospital) with its own IRB, they must ask their own IRB to assess their involvement in the study, including whether any training requirements need to be met.
- If the external personnel are affiliated with an organization that does not have its own IRB, a letter of cooperation from that organization may be needed. (See Letters of Cooperation section.)
- If the external personnel are not affiliated with any organization (e.g., an independent consultant), no additional documentation is typically required.

## Selecting the Best Reviewing IRB Options for Your Study

When planning a multi-site study that will use single IRB (sIRB) review, please contact RELIANT early on so we can assist you in identifying the best sIRB review options for your study. Depending on the nature of your study, number of sites, and other factors, UW-Madison may not be your best option. This is not because the UW-Madison IRB does not want to support our researchers. Rather, we want to ensure the success for your study by helping identify the IRB which will meet the needs of your study.

Among the factors we will review with you:

- Number of study sites engaged in human research
  - The UW-Madison IRB may not serve for more than eight sites without consultation with HRPP leadership
- Timeframe for getting all study sites approved
  - If your study will have a narrow window in which to have all study sites approved, we will discuss with you how best to ensure your deadline is met
- Type of study sites
  - If your study sites do not have their own IRB/HRPP, the reliance agreement process may be protracted so assessing your sIRB options at the time of grant submission is especially important in these cases
- Location of study sites and type of study interventions
  - If your study sites will be outside Wisconsin, additional considerations will apply in assessing your best reviewing IRB option, including whether:
    - Any state laws apply to your study and how IRB review must be conducted

- Study interventions may require specific knowledge of local context to provide appropriate IRB review
  - Study sites have their own IRB/HRPP and, if not, what experience that site has with conducting human research, including qualified study personnel
- Budget considerations
  - While a commercial IRB may be the best option for your study, budgetary constraints may impact whether this is viable for your study.
    - Keep in mind that NIH will pay for sIRB review costs

For more information, see Appendix B- Single IRB Review Requirements.

## When UW-Madison Will Review for External Sites

Decisions about whether the institution can serve as the reviewing IRB are made in accordance with [HRP 333-WORKSHEET-Considerations for Serving as the sIRB](#). For information on how RELIANT identifies the best sIRB option(s) for your study, see the “Selecting the Best Reviewing IRB Options for Your Study” section above. See also Appendix E: Unusual Cases.

UW-Madison IRBs may serve for external sites when:

- The study is funded (e.g., federal, non-profit);
- UW-Madison, UWHC, or Madison VA faculty, staff, or students are involved in the research;
- The UW-IRBs have sufficient knowledge of the local context (as required by federal guidelines) to assume IRB oversight for external sites. Considerations include sites or personnel located in states other than Wisconsin or international locations;
- The study is not exempt;
- Relying sites are AAHRPP accredited, or have a robust Human Research Protection Program.
- Institutional policies do not otherwise prohibit or limit options for serving as IRB of record.

To assist study teams in understanding the sIRB review options available for their study, RELIANT requires a consult prior to study team submitting a grant proposal or IRB application (see Appendix B). The options available depend on how your study is funded and the institution’s role in the study, among other factors. Common situations in which the institution will typically agree to serve as the sIRB for less than 8 sites include:

- Federally funded studies: UW-Madison is the prime awardee and/or lead investigator or, in some cases, a participating site.
- Institutions that are primary awardees typically have the right of first refusal to serve as the sIRB and will decide which institution will serve as the sIRB.
- Private, for profit funded studies (including industry sponsors): UW-Madison is the lead site or the only academic partner on the project AND the funder does not have or is not contracted with another IRB.
- Unfunded studies: Only if UW-Madison is the lead site.

For non-exempt studies with more than 10 sites and/or include sites outside of Wisconsin that do not have an IRB or HRPP (human research protection program), RELIANT will consult with the institutional

official (or designee) to determine whether the institution serving as the sIRB will best meet the needs of researchers conducting large scale studies or if a study team should instead engage a commercial IRB.

## **When UW-Madison Will Review for External Individuals**

External individuals may need IRB oversight if they are engaged in human research for a non-exempt study and not affiliated with an entity with an IRB. In such cases, UW-Madison may agree to serve as their reviewing IRB. Decisions about whether the institution can serve as the reviewing IRB for external individuals who are not affiliated with an entity with an IRB/HRPP are made on a case-by-case basis per federal regulations and institutional guidance.

In some cases, though, UW-Madison IRBs will not serve as the reviewing IRB for external individuals when:

- UW-Madison, UWHC, or Madison VA faculty, staff, or students are not involved in the research;
- The IRB does not have sufficient knowledge of the local context (as required by federal guidelines) to assume IRB oversight for personnel that are requesting UW-Madison serve as IRB of record including personnel:
  - Located in states other than Wisconsin or international locations, particularly if external personnel will be performing study activities for which specific state law apply.
- The study likely qualifies for exemption.

## **International Research**

UW-Madison will often not be able to serve as IRB of record for sites or personnel in countries outside the US. Instead, review and approval by a review board or ethics committee in the country in which the research will be conducted should be obtained (a list of registered international review or ethics boards may be found on the [OHRP web site](#)). In the event a review board and/or ethics committee is not available to review your study and/or does not review the type of research you plan to conduct, please contact RELIANT ([irbreliance@wisc.edu](mailto:irbreliance@wisc.edu)) for assistance.

Additional information about international research can be found [in HRP 103-Investigator Manual](#) and HRP 336-WORKSHEET-International Research

## **UW-Madison Serving as HIPAA Privacy Board**

The institution's IRB also serves as UW-Madison's HIPAA Privacy Board. A HIPAA Privacy Board reviews requests for a waiver or an alteration of authorization for uses and disclosures of PHI. When serving as the reviewing IRB for external sites, the institution will typically agree to serve as Privacy Board for those sites, as applicable.

Even when the institution agrees to serve as Privacy Board for relying sites, those sites are responsible for adhering to their own institution's HIPAA policies, including HIPAA security requirements. In addition, Privacy Boards only review requests for waivers and alterations of authorization. Review of authorization forms or language (if included in a combined consent and authorization form) is the responsibility of the external site. This review will be completed by the relying site during the cede review process. (For information on how RELIANT works with relying sites, see the "Reliance Agreement Process" below.)



Please note that while UW-Madison considers pre-screening of medical records to determine eligibility to be preparatory to research and therefore not requiring a waiver of authorization, some institutions have a different interpretation and a waiver may be required. This is information the relying site typically provides to RELIANT during the cede review process.

For more information, see [HRP-815-FORM-IAA Implementation Checklist](#).

## **Fees and Budget Considerations**

The institution does NOT charge fees to serve as the sIRB, whether for external sites or individuals. Since the institution, however, may not be the best sIRB option for your study, please be aware that commercial IRBs and some academic institutions do charge fees for IRB review. When planning your study – especially if it will involve 10 or more sites and/or locations outside Wisconsin – you should consider whether you will need to use a commercial/independent IRB or an IRB at an academic institution that charges. The study team is solely responsible for paying any IRB fees, although NIH may pay [direct costs for IRB review](#).

Study teams are encouraged to keep in mind that studies involving three or more sites will likely require additional staff support to manage coordination and communicating across sites as well as document management. This role is being called the “IRB Liaison” by many institutions and is typically a staff member who is part of the overall study/lead study team. This may be 0.1 – 1.0 FTE, depending upon the size and complexity of the study. See Appendix C for an example job description.

When working with a commercial/independent IRB as the lead site of a federally funded study, keep in mind that a protocol level submission (protocol review) may be made prior to having all sites and contracts in place. This review is limited to the overall protocol and does not approve sites. However, it is typically acceptable to federal funders as an IRB approval to be able to release additional funds to support further site submissions to the IRB of record.

## **How to Write a Protocol for Studies Involving External Sites**

Studies that involve multiple sites and are not exempt typically require a standalone protocol. (Exceptions may include analysis applications where UW-Madison is only receiving data or specimens from external sites.) Your protocol should address how, among other things, the study will be conducted at all study sites (including subject identification and recruitment) as well as how data storage and transfer will be handled. Your protocol also must include a communication plan to describe how distribution of study documents and interactions among sites will be coordinated.

Several tools are available to help you in writing your protocol:

- HRP 503-TEMPLATE PROTOCOL-Biomedical
- HRP 503a-TEMPLATE PROTOCOL -Registries and Repositories
- HRP 830-WORKSHEET-Communication and Responsibilities
- [NIH protocol templates](#)

## How to Write a Protocol or IRB Application for Studies Involving External Individuals

The study team must describe the role of external individuals (i.e., those not affiliated with an institution with an IRB or HRPP) in the study, including how they will be involved in any study interactions with participants (e.g., obtaining informed consent) or interventions (e.g., administering surveys). If external individuals (unaffiliated with an IRB/HRPP) will be conducting data or sample analysis for the study, you also should describe this in your protocol or application. Depending on their role in the study, external personnel may not be engaged in human research and not need IRB oversight. Nonetheless, their involvement in the study must be described in your protocol or application. For information about how to request UW-Madison serve as the reviewing IRB for individuals as well as training requirements, please see other sections in this manual.

## How to Write a Consent and Authorization Template

As the lead study team, you will need to develop consent and other template documents. Each relying site enrolling participants will have its own consent and, if applicable, authorization documents and these will be based on the template documents you create. Template documents are created using UW-Madison template forms, which are later customized to develop site-specific forms including each site's institutionally required language.

To draft the consent template, start with the UW-Madison template form ([HRP 502-TEMPLATE CONSENT DOCUMENT](#)). If your study requires multiple consent and/or assent documents, then you need to create a template for each document. Relying site study teams will only be able to edit a few areas of the template to include their required institutional language. (Other edits may be allowed if the relying site has, for example, language required by state law.) To indicate which areas of the consent template may be edited, include brackets or other placeholder text in the following:

- Contact information for the study team at the relying site
- Costs to participants, if this will differ for relying sites
- Compensation for research-related injury

If a relying site requires a standalone authorization form rather than including that language in the consent document, start with the UW-Madison authorization template form (see [the HIPAA website](#)) UNLESS the relying site requires its own authorization form be used. (The IRB will accept site-specific authorization forms in lieu of following UW-Madison's template, if required.) If your study requires multiple authorization documents, then multiple templates should be created.

Consent and authorization templates must be approved by the IRB before you can provide them to relying site study team. Upload template consent (including combined consent/authorization) documents in the initial review application as follows:

- Regular initial review application
  - Consent templates should be uploaded where indicated in the application. Please clearly indicate that the document is a template by including "TEMPLATE" in the name of the document. This will ensure that the template document is not stamped by the IRB.
- sIRB initial review application:

- Consent templates should be uploaded in response to the consent template question.
- For both application types, template authorization forms should be uploaded in the application where requested and clearly labeled as a template by including “TEMPLATE” in the name of the document.

## **How to Prepare and Submit Site-Specific Consent and Authorization Documents**

After the template documents have been approved by the IRB, we recommend following the steps below. Please note, however, that each relying site may have a different process that needs to be followed so these steps are only recommendations.

Step 1: Working with the relying site study team, create consent and, if applicable, authorization forms for each site. To create site-specific documents, the relying site study team will use the UW-Madison approved consent and, if applicable, authorization document templates. The relying site study team will:

- Revise the consent template using track changes to include its site-specific language in the three areas of the consent template with placeholder language. Generally, ONLY these three areas of the consent template can be revised by the relying site: contact information for the local PI, study costs, and compensation for injury.
  - If the relying site requires additional revisions other than these three areas (e.g., to address state law requirements), the relying site IRB must contact RELIANT to discuss before proceeding. RELIANT staff will not review consent or authorization documents for relying site if they have extensive revisions and RELIANT has not been previously consulted.
  - If a standalone authorization form is required by the relying site, the relying site study team will revise the UW-Madison’s approved authorization document using track changes to include site-specific language OR provide an authorization document for the relying site using that site’s preferred format.

Step 2: The relying site study team should begin the cede request process at their institution. As part of this process, the relying site study team will provide its own IRB with the site-specific consent/authorization documents that you have created with them and that will be used at that site. The relying site’s IRB will then review the site-specific documents to ensure they meet its institutional requirements.

- If the relying site’s IRB has questions about the site-specific documents, these should be directed to that site’s study team. The relying site study team should consult with you – as the lead study team – in addressing questions raised by the relying site IRB.
- In the event the relying site’s IRB has significant concerns, you may contact RELIANT for assistance. (Do not ask the relying site study team to contact us directly; this will complicate communication moving forward.)
- Note: At this stage in the process, RELIANT and the relying site’s IRB are typically already in contact and working on any needed reliance agreement.

Step 3: After the cede request has been reviewed by the relying site’s IRB and it has indicated to their study team that the consent/authorization documents are acceptable, you will need to formally add the site to your study and obtain approval for site documents as follows:

- Regular application: Submit an expedited change and upload the site-specific documents in the relevant pages of the application. All changes from the approved template must be tracked.
- sIRB application: Submit an “add a site” form for the site being added. Within that form, the study team will upload the site-specific documents where prompted.

Note: A full change of protocol may be needed for the regular or sIRB application if the site being added is not already listed in the application.

After UW-Madison’s IRB has approved the change to add the site and its documents, it will stamp the site-specific consent documents. As the lead study team, you are responsible for then distributing these documents to the relying site. Note: Subject enrollment at relying sites cannot begin until the consent-documents for those sites have been approved by the UW-Madison IRB.

## **Community-Based Research Requirements**

When working with a community partner (e.g., an individual or group employed or volunteering at a community organization and/or self-employed), the first step is to determine whether IRB oversight is required for these partners. IRB oversight is required if they are engaged in human research, as defined by federal guidance (see HRP 311-WORKSHEET-Engagement Determination for details). Whether a community partner is engaged in human research determines whether IRB oversight is even required.

A community partner may be engaged in research, for example, if they are:

- Collecting data (e.g., administering surveys)
- Administering study interventions (e.g., conducting focus groups)
- Consenting participants and/or
- Analyzing identifiable data

A community partner may not be engaged in research if, for example, they are:

- Serving as a location for study activities conducted only by UW-Madison personnel
- Providing recruitment flyers to potential participants
- Referring potential participants to the UW-Madison study team

If a community partner is engaged in human research, then all personnel involved in the research must have their study activities covered by an IRB. Typically, UW-Madison will provide IRB oversight in these situations. When preparing your application, you will need to include an IRB of record request for these individuals. Note that these external personnel must complete human research training and be listed on the IRB application. See other sections for information on how to list them and what human research training options are available.

A formal agreement between UW-Madison and the external individual is required pursuant to federal regulations. One of the following agreements will be used to document that UW-Madison is providing IRB oversight for the external individual:

- For federally funded studies, an individual investigator agreement (IIA) is required. This agreement requires signatures from both the external individual and UW-Madison’s institutional official.
- For non-federally funded studies, a collaborating investigator summary (CIS) is required. This agreement does not require any signatures and is simply provided to the external individual.

In both cases, RELIANT will assist you in putting these agreements in place. NOTE: If the study likely qualifies for exemption, IRB requirements are more flexible and study teams are encouraged to consult with RELIANT before submitting an application.

## Letters of Cooperation

When studies are conducted in whole or in part at sites external to the institution, study teams may need to provide a letter of cooperation from those sites. The purpose of a letter of cooperation is to document that the site is aware of the research and supports its participation in the study. This portion of the manual describes when such letters may be needed, who should provide the letter, and suggestions for template language to include in the letter. NOTE: This does not apply to studies conducted in K-12 settings. See the [Investigator Manual](#) for details.

- *When and For What Types of Sites May Letters of Cooperation Be Needed?*  
Letters of cooperation typically need to be submitted for the following types of sites when study activities beyond recruitment and/or consenting of participants will occur at that site:
  - Sites that do not have an IRB or other committee or group (e.g., ethics committee, research review committee, etc.) reviewing the study; AND
  - For which UW-Madison is not serving as the reviewing IRB.
    - For sites that meet the above criteria, letters are needed for studies that are:
      - Federally funded;
      - FDA-regulated; and/or
      - Involve the access or disclosure of protected health information held by the external site.
- *Are Letters of Cooperation Needed for Other Types of Sites or Studies?*  
Even if not required, we recommend that you obtain permission from sites at which study activities will be conducted (including recruitment), to ensure the site is aware and supportive of the research. These kinds of permissions do not need to be provided to the IRB.
- *Who Should Write the Letter of Cooperation?*  
A letter of cooperation should be signed by someone at the site who is in a position to provide permission for that site to be involved in the proposed study activities (e.g., director or head of community center or organization, manager of a pharmacy). The letter of cooperation should not be signed by a member of the study team conducting research at the site.
  - Template Language
    - A letter or email of cooperation can be brief and should include the following elements:
      - Study title
      - A brief description of the research and/or activities to be conducted at the site

- Person or entity providing permission (including title, contact information, and confirmation of appropriate authority to provide permission)
- For studies involving access to or disclosure of protected health information held by that site, the following statement should be included: I also understand that if the IRB has granted a waiver of authorization, [name of entity] may rely on that waiver in using or disclosing PHI. If any PHI will be disclosed pursuant to the waiver, [name of entity] must account for such disclosures.

## Training Requirements

External personnel must complete required training before the UW-Madison IRBs can serve as their reviewing IRB.

- *External Sites:* Personnel affiliated with an academic institution or other organization with an IRB (e.g., community hospital) must complete human protections training as required by their institution. The relying site's IRB is responsible for ensuring its personnel have completed the training required by their institution. Training certificates do not need to be provided to the UW-Madison IRB; completion of the delegation log serves as confirmation that training requirements have been met.
- *External Individuals:* Personnel affiliated with an organization without an IRB or not affiliated with any entity (e.g., independent consultant) must complete human participant protection training and, if applicable, Good Clinical Practice (GCP) training. Training certificates will need to be uploaded in the IRB application for external individuals. For more information on accessing training, please see [the HRPP Training page](#). In rare cases, external individuals may also need to complete the following training:
  - *HIPAA Training:* External individuals for whom the institution is serving as the reviewing IRB and will use or disclose PHI must complete UW-Madison HIPAA training. For more information, see [the HIPAA training website](#).
  - *Conflict of Interest (COI) Disclosure and Training Requirements for NIH Funded Studies:* If your study is funded by NIH AND external personnel (whether affiliated with a site or not) will be a subrecipient of the NIH award, NIH COI requirements may apply. We recommend consulting with [campus COI staff](#) to determine what requirements may apply in these circumstances.

## When to Use the Single IRB Application

The single IRB (sIRB) application is a separate application type in ARROW intended for studies involving two or more sites for which the institution will serve as the reviewing IRB. The sIRB application is designed to accommodate studies with multiple sites by having dedicated workspaces for each site. This allows for more efficient collection of site-specific information and documents (e.g., consent and authorization forms, recruitment materials).

The sIRB application type should not be used for studies that may qualify for exemption since federal regulations and policies regarding sIRB review do not apply to exempt projects. The sIRB application also

may not be the best option for your study if you are working only with UPH Meriter or Swedish American. Please contact RELIANT if you are not sure which application type is best for your study.

The sIRB application is reviewed the same way as other studies, although the order in which the main application and sites are approved is different. For the sIRB application, the overall study protocol and UW-Madison activities are approved first via the usual initial review process. During initial review, the consent document for UW-Madison as well as the consent template for other sites is approved, as applicable. Template recruitment materials also will be approved as part of this review.

After IRB approval of the main study, you will add each relying site using the add a site form that is part of the overall study workspace in ARROW. This form collects site-specific information, such as local context and site-specific study documents (e.g., consent and authorization forms). You will need to provide the following documents in the add a site form.:

- Site-specific documents (e.g., consent forms, recruitment materials) based on the UW-Madison approved templates with all changes tracked.
- A signed delegation log for that site. For a template delegation log, see [HRP 812-FORM-Site Delegation Log](#). (You may also use a template log you have already developed if it includes the same elements as HRP 812.)
- HRP 811-FORM-Basic Site Information should be completed by the relying site study team and then provided to you to complete the add a site form for the sIRB application.

You can submit more than one add a site form at the same time. The add a site forms are reviewed as expedited changes by RELIANT. When the add a site form is submitted, RELIANT will reach out to the relying site IRB to work on the reliance agreement. Study activities at relying sites cannot begin until the reliance agreement is completed and the add a site form is approved. You will receive an approval letter when the site is approved. Note that we recommend not submitting an add a site form until the relying site study team has started the cede review process with their IRB..

## **How and When to Submit Requests for UW-Madison to Serve as the Reviewing IRB for Other Sites**

To request that UW-Madison serve as the reviewing IRB for an external site, you must include this request in your IRB submission, whether via the regular or sIRB application or a change. When using either the regular or the sIRB application, study teams should list any sites that will be involved in the research as well as whether UW-Madison will be asked to serve as IRB of record for those sites. Before submitting your application, please do the following:

- Ensure your study protocol or application describes the role of any external sites. See [HRP 503-TEMPLATE-Biomdedical](#) Protocol, [HRP 503a – TEMPLATE – Registries and Repositories Protocol](#), the [NIH clinical trial protocol template](#), and [the NIH behavioral and social sciences protocol template](#) for more information on how to include external sites/personnel in your protocol document.
- Confirm that external study teams or individuals have consulted with their own IRB to a) ensure that the site would be willing to cede IRB review to UW-Madison and b) understand what steps are required to cede IRB review to UW-Madison. Every site has its own policy and process for relying on another IRB, so the reliance process goes more smoothly if you work with your

collaborators to address these issues in advance. The same process applies to individuals affiliated with an entity with its own IRB.

The IRB will typically use what is called a parent-child model for approving the main study and relying sites. This means that the overall study (including UW-Madison's role in the study) is approved by the IRB first, with a list of relying sites approved in theory. After the overall study is approved, relying sites are formally approved via a change (see below) and a reliance agreement is put in place at that time. Note that for some studies involving one or two external sites or individuals (e.g., UPH Meriter), it may be more efficient for the sites to be approved with the initial review application if the regular application is used.

Although where sites are listed in the application is similar, where the actual reliance process starts differs.

- *Where to list sites in the initial application*
  - For the regular initial review application, list sites in the study location section. Keep in mind that the regular application should generally be used for two sites (UW-Madison and one external site).
  - For the regular initial application, if the reliance agreement will be completed with the initial review, you will need to upload a signed delegation log for the external site. See HRP 812-FORM-Site Delegation Log for a template. You may also need HRP 811-FORM-Site Information. We can assist you in determining whether the reliance process can be completed with the initial review.
  - For the sIRB application, list sites in the study location section. No other information about these sites needs to be added. The reliance process for each site will not begin until add a site forms are submitted.
- *Changes*
  - For the regular initial review application, sites not formally approved as part of the initial review process need to be added via a change. With the change, you will need to upload the delegation log (HRP-812 FORM Site Delegation Log) and, as applicable, other site-specific study documents (e.g., consent documents)..
  - For the sIRB application, approval for sites will not be finalized until add a site forms are submitted after the UW-Madison IRB approves the study. You will submit one add a site form for each site and upload site-specific documentation (including delegation log; HRP-812 FORM Site Delegation Log) in the add a site form.
  - Please use HRP-811 FORM Basic Site Information (completed by relying site study team) to upload to the Supplemental Section of regular application, or as a tool to collect information from relying sites to complete the add a site form for the sIRB application.

Upon submission of the request to add a site, RELIANT manages the process for securing the appropriate reliance agreement, including working with the relying site's IRB. While the UW-Madison study team will need to work with the relying site's study team on the request to cede IRB review and developing site-specific study documents, RELIANT will handle any communication with the relying site IRB. Please note we recommend not submitting a change to add a site until the relying study team has started the cede review process at their own institution. The reliance agreement process cannot begin



until the relying site's IRB has received a cede request from their study team and submitting a change before this has happened may cause unnecessary delays for your study.

## **How You Can Help with the Reliance Process**

RELIANT supports study teams by facilitating the reliance agreement process with other institutions. This includes managing the reliance agreement process with other sites from start to finish. When the agreements are in progress, we track them closely and reach out to the other institution if the process is not moving efficiently. You also can play an important role in helping the process go as smoothly as possible.

An efficient reliance process depends in part on carefully choosing collaborating sites. Due to differences among institutional requirements and policies as well as experience with reliance processes, some sites may take longer to onboard than others. If the success for your study depends on getting sites up and running as quickly as possible, you should assess whether the site and the local study team will be able to contribute to an efficient reliance process. Factors to consider include the following:

- Does the site have a process for ceding IRB review to an external IRB?
  - You can find this information on the site's IRB or HRPP website.
  - RELIANT also has experience with several academic institutions and we are available to provide you with some insight on how the reliance process may progress at those institutions.
- Is the local PI actively involved in study preparation activities (e.g., working with you to get funding set-up at the site, responding promptly to your queries)?
  - Lack of involvement and good lines of communication early on can be a sign that the site will take some time to onboard.
- Does the local study team have regulatory support staff?
  - If the regulatory work (e.g., development of site-specific study documents, submitting a cede application) will fall to the PI, this may slow-down the reliance process.
- Is the local study team experienced with their site's process for ceding IRB review?
  - If a study team is new to the process, you will likely need to support them as they work through the cede process at their site.

If any of your sites will not be academic institutions (e.g., community hospital or organization), encourage your potential collaborator to reach out to their IRB or human research administrator to determine early on if that site is familiar with ceding IRB review and has a process in place for doing so. We encourage you to contact us early on if you plan to work with these types of sites so we can assist you in determining whether and/or how to move forward.

After you select your sites, implementing your communication plan early to get lines of communication established typically ensures the entire add a site process will go more smoothly. These early communications can help you identify any trouble spots (e.g., delays in funding, turnover in regulatory staff) and address those promptly. You can also encourage your collaborators to reach out to their IRB/HRPP to discuss the cede review process so those sites are ready to move forward as soon as your overarching study is approved.

After your overarching study is approved, reach out to your sites to find out if they are ready to move forward with submitting a cede request at their institution. If so, provide them with the UW approved consent and other study templates so the local site can revise them to meet their site-specific requirements. They will need to submit these documents with their cede request so you may need to provide them assistance as they put these together.

When local site study teams either submits or is close to submitting their cede request, you should submit the change or add a site form to the UW-Madison IRB. Closely coordinating the timing of these submissions will help RELIANT and the relying site IRB get the site approved more quickly. If, on the other hand, a site is not yet ready to submit its cede request, do not submit the change or add a site form at UW-Madison. Neither RELIANT nor the relying site IRB can move forward with a reliance agreement until the relying site study team has submitted or is close to submitting a cede request.

### **How to Submit a Request for UW-Madison to Review for External Individuals**

The UW-Madison IRBs may agree to serve as IRB of record for external personnel engaged in human research. For more information, see the “When UW-Madison Will Review for External Individuals” section.

To submit a request for UW-Madison to serve as the reviewing IRB for external personnel, please include this in your initial review or change of protocol as follows:

- When you reach the external collaborations section of the application:
  - In response to question 1.2, answer “Yes” to indicate you are requesting UW-Madison serve as the reviewing IRB for external sites or personnel.
  - In response to question 1.2.1, check the appropriate box(es) to indicate if you are requesting UW-Madison serve as reviewing IRB for external individuals (e.g., people working with community organizations).
  - You will then be branched to the appropriate page of the application to provide details about the external personnel.
- Please note that you will need to upload human research and, if applicable, GCP training certifications in the application. For more information, see the “Training Requirements” section.

### **Types of Reliance Agreements**

Before one institution can rely on another institution’s IRB to provide IRB oversight for a study, the two institutions must document that arrangement through a reliance agreement. The agreement documents respective authorities, roles, and responsibilities between the University of Wisconsin-Madison and the other institution. Reliance agreements must be executed on a per study basis, per federal requirements.

Different kinds of agreements may be used to document reliance between sites. UW-Madison uses the following:

- *SMART IRB agreement*
  - Reliance under this agreement is documented via a joint memo.

- Neither organization’s institutional official needs to sign this memo, which can help the reliance progress move more quickly.
- SMART IRB is not an IRB; it is an agreement that helps facilitate the reliance process.
- *IRB authorization agreement (IAA)*
  - Reliance under this agreement is documented by a standalone document that requires a signature from each organization’s institutional official
  - UW-Madison has its own IAA template for use in these situations
  - If the relying site requires revisions to the IAA template, review by legal counsel may be required.

Whichever type of agreement is used, RELIANT facilitates execution of the agreement, working closely with the relying site IRB and, if applicable, legal counsel. Note that only UW-Madison’s institutional official can sign a reliance agreement.

As part of our support for the research community, RELIANT handles all aspects of the reliance agreement process with other institutions. Study teams are not responsible for putting these agreements in place or answering questions from other sites about types of reliance agreements or UW-Madison’s reliance process. If you receive these kinds of questions from other sites or study teams, please reach out to RELIANT so we can handle these queries for you.

## **Reliance Agreement Process**

For another institution to rely on UW-Madison’s IRB, a reliance agreement needs to be put in place as required by federal guidance and regulations. The purpose of such agreements is to document the roles and responsibilities of each institution and their study teams in the conduct and oversight of the study. Reliance arrangements need to be documented on a per study basis, even in cases where institutions have signed on to SMART IRB. UW-Madison primarily uses the SMART IRB agreement and documents reliance via memo, but will enter into an IRB authorization agreement (IAA) if needed.

The process involves several steps that RELIANT facilitates. For information on how you can help make the reliance process go as smoothly as possible, see the “How You Can Help with the Reliance Process” section. For information on the process for establishing agreements with external individuals, see the “When UW-Madison Will Review for External Individuals.” Note that the steps below reflect the most commonly used reliance process; these steps may differ depending on the external sites involved.

Step 1: Study team submits formal request for UW-Madison to serve as reviewing IRB (typically via a change).

Step 2: RELIANT reviews the request to determine all required documents have been submitted with the request.

Step 3: RELIANT reaches out to the relying IRB to confirm it is willing to cede IRB review and what type of agreement is needed.

Step 4:

- If the relying institution has received a cede request from its study team, the reliance agreement process continues.

- If the cede request has not been received, the reliance process is on hold until that application is submitted.

Step 5:

- If either institution requires revisions to study documents (often the consent or authorization document), it will work with its own study team to make those changes. The next step of the reliance process will be on hold until these modifications have been made.
- As the lead study team, you will need to work with the relying site study team to address any request for modifications as needed.

Step 6: Once all modifications have been addressed, the reliance agreement is finalized:

- If the SMART IRB agreement is used, RELIANT provides the relying IRB with a memo documenting reliance.
- If an IAA is required, the relying site will sign the agreement first and then send to RELIANT, who will then forward it to the UW-Madison institutional official for signature. The agreement is complete when all necessary signatures have been obtained. Note that if a relying institution requires use of an IAA that is complex or uses language atypical for such agreements, review by legal counsel is required before the IAA can be signed by either site.

Step 7: After the agreement is completed, RELIANT or the IRB will approve the change and study activities can then begin at that site.

## Lines of Communication

Multisite studies involve communication among many stakeholders and, as a lead study team, you will be responsible for developing clear lines of communication. Therefore, when you are planning a multisite study for which UW-Madison will serve as the reviewing IRB, one of the most important documents you need to create is a communication plan. A robust communication plan helps ensure that your collaborations with relying sites will run as smoothly as possible. The communication plan needs to be included in your study protocol or, for non-protocol based studies, uploaded in your IRB application.. For guidance on developing this plan, [see HRP 830-WORKSHEET-Communication and Responsibilities](#). The purpose of a communication plan is to clearly outline the roles of the four main groups involved in multisite studies:

- Lead study team (including the lead PI)
- Relying site study team (including a local PI)
- Reviewing IRB (UW-Madison when serving as the sIRB)
- Relying site IRB/HRPP

Some of the elements of a communication plan include:

- Who provides IRB documentation to relying sites as well as how and when
- How changes to the overall study and/or sites will be prepared and submitted
- Management of continuing review information
- Plan for handling reportable events

Please keep in mind that while RELIANT provides support to UW-Madison study teams navigating reliance and institutional requirements for human research, we cannot answer questions from relying site study teams about their own institutional requirements or IRB submission processes, including how to request IRB review be ceded to UW-Madison. We encourage you to work closely with your collaborators to ensure they are in contact with their own IRB early in the reliance process; this will help make the review process move more efficiently.

## Single IRB Review Platforms

Each IRB typically has an electronic platform to manage their review and submission process, including for single IRB arrangements. In addition, a few national electronic platforms exist to facilitate the reliance process and/or document management for multisite studies. Below is a general description of these platforms as well as how you may use them.

### *IRB-specific platforms*

- ARROW is UW-Madison's IRB platform for IRB submission and review. You will use ARROW to submit requests for UW-Madison to serve as the reviewing IRB and adding sites. Only UW-Madison study team members will need access to ARROW.
- ARROW cannot be used to disseminate IRB approvals or study documents to relying sites. As the lead study team, you are responsible for identifying a tool or process for sharing of documents with relying sites, which needs to be described in your study communication plan.
- IRB submission systems at other sites generally work similarly to ARROW. Some sites, however, require that the lead study team access their IRB system directly as part of the review process and/or sharing of documentation. What local sites require is something you should talk about with your collaborating sites when discussing their reliance process.

### *Reliance/Multisite-specific platforms*

- [IRB Reliance Exchange](#) or IREx is a free web-based portal designed to support single IRB review processes and dissemination of study documents. If you are planning to conduct a study with more than 3 sites, IREx may be a good option for sharing and disseminating study documents. We can assist you in determining whether IREx or another document sharing tool would work well for your study.
- SMART IRB Online Reliance System (ORS) is hosted by SMART IRB and is designed solely to support the reliance review process among IRBs. UW-Madison typically does not use the ORS due to the administrative burden it places on study teams. If an external site asks you to use the ORS, please contact RELIANT to discuss alternatives.

## Approval Process for Reviewing IRB Requests

The IRB must approve the addition of relying sites before study activities may begin at those sites. As noted above, the IRB typically uses what is called a parent-child model for approving relying sites. This means that the overall study is approved by the IRB first, with a list of relying sites approved in theory. This parent-child model is followed by most commercial IRBs and is used by the UW-Madison to provide

maximum flexibility for study teams. Since relying sites are ready to be added to a study at different times (or may end up never being formally added), the parent-child model allows sites to be added as they are ready to move forward without holding up approval of the overall study.

After the overall study is approved, relying sites are formally approved as follows:

- For the regular application, study teams submit an expedited change to obtain formal approval for the relying sites. If a site is not already listed in the approved application, a full change may be required.
- For the sIRB application, study teams will submit an “add a site” form for each relying site to obtain formal IRB approval for that site. As with the regular application, a full change may be required to add a site if it is not already in the approved application.

As part of the formal approval process, RELIANT will work with the relying site’s IRB to finalize a reliance agreement, including documenting any local requirements. Any site-specific documents (e.g., consent, recruitment materials) will be approved during the IRB review process. Sites are approved to begin study activities when the UW-Madison IRB has approved the site, the reliance agreement is complete, and the relying site study team has met any institutional requirements at their site.

NOTE: For studies involving only one or two other sites (e.g., studies involving UW-Madison and UnityPoint Health Meriter), please contact RELIANT for assistance in how best to obtain approval for those sites.

## **Follow-On Submissions for UW-Madison and/or the Study-wide Protocol**

As the reviewing IRB, UW-Madison is responsible for providing ongoing IRB oversight to the study. Follow-on submissions that impact the main protocol and UW as a site need to be submitted to the UW-Madison IRBs for review and approval. For changes that only affect a particular site(s), please see the section below on how to submit follow-on submissions for relying sites.

- *Changes:* For changes to the overall study or that will affect only UW-Madison, you should submit a change as you normally would. If the overall study protocol or other overall study documents (e.g., investigator’s drug brochure) is being revised, the UW-Madison study team must notify all relying site study teams of the IRB’s determinations (including providing the approval letter) and, if applicable, provide the latest versions of approved documents (e.g., protocol). For changes to all site consents, submit the change to the template/UW-Madison consent for approval first, then for each relying site.

*Continuing Review:* If a continuing review is required for your study, Only one continuing review application needs to be completed and will cover all relying sites.

- UW-Madison and all relying sites will have the same expiration date.
- Continuing review applications at UW-Madison should be submitted no later than 45 days prior to the expiration date.
- Please use [HRP 816-FORM-Site Continuing Review](#) as a tool to collect information from relying sites for the continuing review application. When all relying sites have provided you with their information, please upload the completed version of HRP 816 to the continuing review form.
- Once a continuing review is approved, you as the study team must notify all relying site study teams of the IRB’s determinations, including providing a copy of the approval letter.

### *Reportable Events:*

- Reportable events (e.g., unanticipated problems, noncompliance, participant complaints) that occur only at UW-Madison must be reported to the UW-Madison IRBs pursuant to UW-Madison requirements.
- Reportable events that may affect the study as a whole (e.g., new risk information, unanticipated event that requires change in study procedures) should be submitted to the UW-Madison IRB pursuant to UW-Madison requirements.
- For reports regarding the study as a whole, you as the lead study team must notify all relying site study teams about the IRB's determinations, including communicating any corrective action plans.
- Even if the report is for an event that occurred only at UW-Madison you as the lead study team are responsible for communicating to relying site study teams any unanticipated problems involving risks to participants or other research-related injuries, or significant subject complaints that are related or may affect all study participants at relying sites.

### **Follow-On Submissions for Relying Sites**

As the reviewing IRB, UW-Madison is responsible for providing ongoing IRB oversight to the study and all relying sites. This means that you as the lead study team are responsible for submitting follow-on submissions for relying sites, including changes to study documents at each study site. (Note that the relying study team remains responsible for complying with their own institution's reporting requirements for any follow-on submissions.) Here are the most common types of follow-on submissions you are responsible for and the process for each.

- *Changes:* All changes made at the relying site must be submitted to the UW-Madison IRB. Unless changes are being implemented to eliminate an apparent immediate hazard to subjects, changes at relying sites cannot be implemented until IRB approval is received. Generally, the process is as follows:
  - Use HRP-813 – FORM- Site Modification as a tool to collect information from relying sites (the relying study team completes). After they have completed the form, they should return it to you. You do not need to submit this form to the IRB, but you should retain it for your study file.
  - After you have received the completed form (HRP 813) from the relying site, you may submit the change to the IRB.
    - For the regular application, you will use the same process for submitting a change to a relying site as other changes.
    - For the sIRB application, you will use the change button in the relying site workspace. For changes that will affect multiple sites (e.g., consent form revisions), you will need to submit a change for each study site. Note that you can submit changes for multiple sites at the same time.
  - Once a change is approved, the UW-Madison study team must notify those relying sites for which a change was submitted of the IRB's determinations (including providing the

approval letter) and, if applicable, provide the latest versions of approved documents (e.g., consent documents).

- *Continuing review*: If your study requires continuing review, you are responsible for collecting information from each site needed for the continuing review application, including enrollment numbers, withdrawals, and unresolved participant complaints. Please see the “Follow On Submissions for UW-Madison and/or the Study-wide Protocol” section for more information.
- *Reportable events*: Reportable events (unanticipated problems, noncompliance, participant complaints) that occur at any site for which UW-Madison is serving as the reviewing IRB must be reported to the UW-Madison IRBs pursuant to UW-Madison policies. You as the lead study team are responsible for obtaining relevant information from relying sites and submitting information to the UW-Madison IRBs for review.
  - To gather information from the relying site(s) at which the event occurred, complete HRP 814-FORM-Site Reportable Event with the relying study team. After the relying site study team has reviewed and signed the form, they should return it to you. You do not need to submit this form to the IRB, but you should retain it for your study file.
    - Receipt of the signed HRP 814 from the relying site is NOT a prerequisite for submitting a reportable event.
  - After you have received the completed HRP 814 or if reporting the event must occur before the form is received, you should submit the reportable event to the IRB.
    - For the regular application, you will use the same process for submitting a reportable event for a relying site as other reportable events.
    - For the sIRB application, you will use the same process for submitting a reportable event for a relying site as other reportable events. You will need to indicate at which site(s) the event occurred.
      - If the reportable event affects all sites, you will indicate this in the reportable event form.
  - Once review of a reportable event is completed, you as the study team must notify all relying site study teams affected by the reportable event of the IRB’s determinations, including communicating any corrective action plans.
    - The relying site study team is responsible for consulting with their own IRB about whether any additional reporting is needed to their own IRB.
  - Note that you as the lead study team are responsible for communicating to relying site study teams any unanticipated problems involving risks to participants or other research-related injuries, or significant subject complaints that are related or may affect all study participants at relying sites.
  - If the event is of sufficient severity, UW-Madison will consult with the relying site’s IRB and will coordinate with that IRB regarding any corrective action plans, reporting to federal agencies (if applicable), and post-approval monitoring.
- *Personnel changes*: Relying site study teams are responsible for consulting with their own IRB about what personnel changes need to be reported to their own IRB. Personnel changes that need to be reported to UW-Madison include:
  - Change in PI at the relying site
  - Updates to delegation logs, which only need to be submitted every 6 months.



## UW-Madison Principal Investigator and Study Team Responsibilities

When the institution agrees to serve as the reviewing IRB for external sites or personnel, the UW-Madison study team must follow relevant UW-Madison requirements and assume several responsibilities, including, but not limited to:

- Contacting RELIANT ([irbreliance@wisc.edu](mailto:irbreliance@wisc.edu)) to:
  - Discuss whether UW-Madison can act as the single IRB for all or some institutions or personnel participating in this study or whether another external IRB would be appropriate.
  - Identify who will act in the role of the Lead Study Team (e.g., your own study team, a coordinating center). Due to the additional responsibilities that a Lead Study Team assumes, an IRB liaison may need to be hired. To review a sample job description language, please see the IRB Liaison section.
  - Provide RELIANT with details about the study, including the study-wide protocol and template consent document(s), which will help facilitate the discussion of single IRB review options.
- Identify all sites that will be engaged in human research.
- If the institution agrees to serve as the sIRB, the UW-Madison study team must:
  - Include the relevant reliance request in the IRB application and protocol.
  - Work with the IRB and RELIANT to determine specific roles and responsibilities for communicating key information to relying sites, including developing a communication plan (i.e. regular conference calls, site initiation). For template communication plans, see [HRP-830 WORKSHEET Communication and Responsibilities](#) or [SMART IRB template communication plan](#).
  - Promptly respond to questions from relying site study teams and IRB/Human Research Protection Program personnel.
- When preparing the UW-Madison IRB application, the UW-Madison study team must:
  - Obtain from the relying site study team information regarding how the study will be conducted at that site if different from the study-wide protocol (e.g., recruitment processes may differ among sites). See [HRP-811 FORM Basic Site Information](#). This form does not need to be submitted to the IRB; rather it is a tool to assist you in collecting and tracking information for relying sites.
  - Assist relying site study teams in ensuring consent documents for that site use the approved UW-Madison template and is revised to include applicable site-specific required language for that site.
- Provide relying sites with links to UW-Madison HRPP policies.
- Provide relying site study teams with the IRB-approved versions of all study documents (e.g., consent and authorization forms, protocol, recruitment materials).
- Notify site investigators of all IRB determinations.
- In coordination with the IRB and RELIANT, promptly notify the relying site study team of any unanticipated problems involving risks to subjects or others or significant subject complaints that may affect subjects at the relying site, including potential impact on willingness to continue study participation.

- If the study requires continuing review, the UW-Madison study team must notify relying site study teams of any lapse in IRB approval and, if applicable, any resulting corrective action plans.
- Promptly notify relying site study teams of any change in the continuing review requirement for the study.
- Provide access, upon request, to study records for audit by relying sites.

## **Relying Site Investigator Responsibilities**

The lead study team must provide the forms below to the relying site study team. The relying site study team is then responsible for completing and returning the following documents to the lead study team at initial review:

- [HRP-812 FORM Delegation Log](#)
- Site-specific study documents, such as consent and authorization forms and recruitment materials.

The documents below are tools that you as the lead study team may use to collect information from the the relying site. The relying site study team would then be responsible for completing and returning the relevant document to the lead study team; these tools would be for your reference only and do not need to be submitted to the IRB:

- HRP-811 FORM Basic Site Information (for initial review)
- [HRP-813 FORM Site Modification](#)
- [HRP-814 FORM Site Reportable Information](#)
- [HRP-816 FORM Site Continuing Review](#)

Each relying site remains responsible for ensuring safe and appropriate performance of the research at their site. Relying site study teams are responsible for following their own institution’s process and requirements for relying on an external IRB, including completion of locally required ancillary reviews. The relying site study team also is responsible for coordinating closely with you as the lead study team and promptly responding to your communications with them. For more information, see SMART IRB’s [Relying Site Investigator Checklist](#).

## **UW-MADISON RELYING OR CEDING IRB REVIEW**

### **Engagement**

IRB oversight may not be required for your role in a study if you are not engaged in human research per federal guidance. This is important because you may not need to submit a request to cede IRB review if UW-Madison is not engaged in human research. Examples of when you might not be engaged include conducting analysis on data or samples that are deidentified or coded, assisting with study recruitment, or providing guidance on study design. Engagement determinations can be complicated, so we encourage you to contact us for assistance in making this assessment.

For more information, see [OHRP's engagement guidance](#) and HRP 311-WORKSHEET-Engagement Determination.

## Exemptions

Federal regulations do not require single IRB (sIRB) review for multisite studies and UW-Madison will not cede IRB review for exempt studies except in rare cases (e.g., sponsor requirements). Please keep in mind the review process for an exemption application at UW-Madison is typically faster than that for establishing a reliance agreement.

## When UW-Madison Will Rely on an External IRB

UW-Madison has broad parameters for when it will cede IRB review to an external IRB. Exceptions include when:

- The study is not funded
- UW-Madison is not engaged in human research, the project does not constitute human research, or the study is exempt
- The study involves the Madison VA
- Fetal tissue research will be conducted at UW-Madison/UWHC

Please note that other factors may affect the decision to cede IRB review (e.g., the proposed reviewing IRB declines to serve or is not in good standing with federal agencies).

For more information, see [HRP 832-WORKSHEET-Criteria for Relying on an External IRB](#).

## HIPAA Privacy Board Considerations

The UW-Madison IRB serves as the institution's HIPAA privacy board. This means the IRB is responsible for reviewing and granting requests for waivers or alterations of HIPAA authorization. When ceding IRB review, we will also cede privacy board review when the reviewing IRB agrees to assume that responsibility. In some cases, however, the reviewing IRB will not agree to serve as the privacy board and UW-Madison is then required to retain that responsibility. If this occurs and your study requires a HIPAA waiver, you will need to provide additional information with your cede application to ensure we can provide appropriate privacy board review. RELIANT will advise you when this is required and when you will need to complete [HRP 810-FORM-Applications for HIPAA Waiver for Ceded Studies](#). If required, the completed form should be uploaded in the supplemental information page of the cede application.

Please note that a HIPAA privacy board is not responsible for reviewing authorization forms and this remains an institutional responsibility. If your study requires use of an authorization form, RELIANT will review that form to ensure the required elements are included during its review of your cede request. For more information, see [HRP 834-WORKSHEET-Institutional Requirement for Ceded Studies](#) and [HRP-502c -TEMPLATE- Institutional Consent Language](#). For criteria used by the IRB to grant a waiver or alteration of authorization, see [HRP 441 – CHECKLIST – HIPAA Waiver of Authorization](#).

## Types of External IRBs

UW-Madison has experience working with various external IRBs. Depending on the nature of your study and sponsor, more than one type of external IRB may be appropriate for your study. RELIANT can assist you in identifying the best external IRB option for the study. External IRB options include:

- *Commercial IRBs – Contracted:* UW-Madison has contracted with the two largest commercial IRBs – Advarra and WCG. Studies funded by industry sponsors will typically be reviewed by either of these IRBs.
- *Commercial IRBs – Not Contracted:* UW-Madison can cede IRB review to qualified commercial IRBs with which it is not contracted. These decisions are made on a case-by-case basis and require a separate reliance agreement.
- *National Cancer Institute Central IRB (NCI CIRB):* Studies sponsored by the NCI are reviewed by the NCI CIRB.
- *Academic Institutions:* UW-Madison regularly cedes IRB review to other academic institutions, often for studies with federal funding.
- *Other institutions:* UW-Madison may cede IRB review to other institutions such as community hospitals (e.g., UPH Meriter) or healthcare systems (e.g., Advocate Aurora Healthcare).

## International Ethics Boards

Countries outside the United States often have ethics boards that serve the same role as an IRB, although they generally follow their own country's regulations. In some cases, UW-Madison may consider ceding IRB review to an ethics board. These decisions are made on a case-by-case basis and require input from UW-Madison legal counsel.

## Fee and Budget Considerations

Study teams should be aware that IRB fees may apply to studies reviewed by an external IRB and budget accordingly. (UW-Madison does not charge a fee for reviewing a cede application except as described below.) IRB fees may be charged in the following cases:

- Commercial (independent) IRBs charge for their services.
  - Industry sponsors typically cover these fees.
  - UW-Madison charges a one-time fee (\$2000) for review of industry-sponsored cede applications to cover administrative costs. Again, industry sponsors will typically cover this fee.
  - To obtain a fee schedule for a commercial IRB, you will need to contact them directly.
- Other academic institutions may charge for their services.
  - The lead study team is responsible for consulting with the reviewing IRB to determine what, if any, fees it charges and communicating this information to relying sites.
  - If the reviewing IRB charges fees that apply to your role in the study, you are responsible for working with the lead study team to determine how these costs will be covered.

## How to Write UW-Madison Consent Documents

If you will be enrolling participants at UW-Madison/UWHC sites, you will need to draft a consent document with required UW-Madison language. We recommend the following process when drafting consent documents for external IRB review:

- The UW-Madison consent document should be based on the IRB-approved consent template provided by the sponsor or lead study team.

- We advise against revising a consent template that is not yet approved by the reviewing IRB as it is likely to request revisions to the template during its review process.
- In the event you are not provided with a consent template, you may use UW-Madison's template (HRP 502-TEMPLATE CONSENT DOCUMENT).
- Revise the consent document to include UW-Madison institutionally required language. See HRP 502c-STANDARD CONSENT LANGUAGE for the specific language that needs to be included.
- When you submit your request to cede IRB review, upload the UW-Madison consent document in the application. We will review this along with the other documents you provide.
- The IRB of record is responsible for reviewing and approving the UW-Madison consent document. The reviewing IRB may request your consent document as either part of the reliance process or after reliance has been approved. Practices vary by institution, so please consult with your lead study team as to when the UW-Madison consent document needs to be submitted.
- You cannot use the UW-Madison consent document until it is approved by the reviewing IRB. The lead study team should provide you with the UW-Madison approved consent document or provide instructions on how you obtain it.

## **How to Write UW-Madison Authorization Documents**

If your study requires use of a HIPAA authorization form, the lead study team should provide you with an authorization template or authorization language included in a combined consent and authorization template. Either format is acceptable. If a separate authorization form will be used for the study, you should only need to make minimal revisions to reflect the UW-Madison PI and contact information. If the reviewing IRB/lead study team does not provide a template authorization form, you should use [the UW-Madison templates](#).

Regardless of the format, RELIANT will review authorization language to confirm the required elements are present. For more information on required authorization elements, see HRP 834-WORKSHEET-Institutional Requirements for Ceded Studies and HRP-502c mentioned above.

## **Study Protocol and Site Supplement**

In the cede application, you will be asked to upload the IRB-approved study protocol or, if no study protocol is available, a copy of the IRB-approved application. The lead study team will need to provide you with this document. Whichever document you use, it will need to clearly describe the role of UW-Madison/UWHC in the study. This is important because the institution cannot cede IRB review without knowing what study activities will be occurring here, including who from UW-Madison/UWHC will be involved in the study. RELIANT uses this information to assess whether the study qualifies for ceded review and to identify any institutional requirements that must be met before study activities can commence at UW-Madison/UWHC, as applicable.

If neither the IRB-approved study protocol or application describe UW-Madison/UWHC's role in the study, you will need to complete HRP 508-TEMPLATE SITE SUPPLEMENT and upload this in your cede application. This will provide RELIANT with the information needed for its review process. Some sections of the site supplement may not apply to your study and you may edit the document as needed.

## **How and When to Submit a Request to Cede IRB Review**

Study teams must submit a request to cede IRB review when they want to use an external IRB. The cede request is its own application type in ARROW and includes places to upload the study protocol as well as consent and authorization documents that will be used to enroll subjects at UW-Madison/UWHC, as applicable. RELIANT cannot review your request until all required study documents are provided. We recommend you follow the steps below when considering ceding review to an external IRB as well as when to submit a request. (Note these steps do not apply to NCI or commercial IRBs.) Since processes vary across institutions that serve as reviewing IRB, these steps may differ.

Step 1: If your study is not federally funded, consult with RELIANT for guidance in determining whether ceding IRB review is the best option for your study. Especially if your study is minimal risk, it is often faster and simpler to seek IRB approval at the UW than ceding IRB review to an external IRB. (A reminder that UW will not cede IRB review for exempt studies except in rare cases (e.g., sponsor requirement)).

Step 2: Ensure that external IRB is willing to serve as the IRB of record for you. We recommend that your collaborators at the site which may serve as IRB of record confirm this with their IRB rather than you directly contacting that IRB. Not all IRBs will agree to serve as the reviewing IRB, so it is important to check that they are amenable to serving.

Step 3: If the proposed reviewing IRB agrees to serve, we recommend submitting a request to cede IRB review only after the reviewing IRB has approved the study, including a template consent document, if applicable. Waiting until the reviewing IRB has approved the study ensures you are working with the most current study documents rather than drafts still undergoing revision. The lead study team is responsible for sending you the approved study documents for use in your cede request application. Upon receipt of your cede request, RELIANT will begin the reliance agreement process with the reviewing IRB.

In the event a funder or reviewing IRB requires that a cede request be submitted at UW-Madison before a study is approved, please reach out to RELIANT so we can help identify next steps in these unique situations.

## **Reliance Agreement Process**

For UW-Madison to rely on an external IRB, a reliance agreement needs to be put in the place as required by federal guidance and regulations. The purpose of such agreements is to document the roles and responsibilities of each institution and their study teams in the conduct and oversight of the study. Reliance arrangements need to be documented on a per study basis, even in cases where institutions have signed on to SMART IRB. UW-Madison prefers to use the SMART IRB agreement and document reliance via memo, but will enter into an IRB authorization agreement (IAA) if required by the external IRB. RELIANT facilitates the reliance agreement process and the UW study team does not need to be involved in this process. If the lead study team or reviewing IRB asks you questions about the reliance agreement process here, please forward them to us and we will respond to them directly. (Note that the information in this section does not apply to commercial IRBs with which the institution is already contracted or the NCI CIRB.)

The process involves several steps that RELIANT facilitates. For information on how you can help make the reliance process go as smoothly as possible, see the “How You Can Help with the Reliance Process” in the ceding review section of this manual. Note that the steps below describe the most common reliance process. Since processes may vary across institutions, different steps may be required.

Step 1: Study team submits a cede request in ARROW.

- You will need to upload the UW-Madison specific consent document and, if applicable, separate authorization form. For information on how to create these documents, see other sections in this manual.
- If the lead study team and/or reviewing IRB provides forms to you (e.g., local context form) that need to be completed as part of the reliance process, please do not complete these on your own and instead upload them on the supplemental information page of the application. RELIANT will typically complete these forms on your behalf and provide them to the reviewing IRB.

Step 2: RELIANT reviews the request to determine all required documents have been submitted with the request.

Step 3: RELIANT reaches out to the reviewing IRB to confirm it is willing to provide IRB oversight for the study and, if so, what type of agreement is needed. Note that RELIANT is responsible for working with the reviewing IRB to determine what type of agreement will be used to document reliance. If you receive queries from the reviewing IRB or lead study team about what type of agreement UW-Madison uses, please refer them to us and we will follow up as needed.

Step 4:

- If the reviewing institution has received a request from its study team to serve as the reviewing IRB for UW-Madison, the reliance agreement process continues.
- If this request has not been received, by the reviewing IRB, the reliance process is on hold until that application is submitted.

Step 5: If either institution requires revisions to study documents (often the consent or authorization document), it will work with its own study team to make those changes. The next step of the reliance process will be on hold until these modifications have been made.

As a relying site study team, you will need to work with the lead study team and/or coordinating center to address any request for modifications as needed.

Step 6: Once all modifications have been addressed, RELIANT will finalize the agreement with the reviewing IRB:

- If the SMART IRB agreement is used, RELIANT and the reviewing IRB will document reliance via memo that does not require signatures.
- If an IAA is required, UW-Madison’s institutional official will need to sign the agreement first. When signed, RELIANT will send it to the reviewing IRB, who will then forward it to their institutional official for signature. The agreement is complete when all necessary signatures have been obtained.

Step 7: After the agreement is completed, RELIANT will approve the request to cede IRB review and you will receive an approval letter via ARROW. Note that you cannot begin study activities until the reviewing IRB has approved your participation in the study and all relevant UW-Madison/UWHC requirements have been met. For more information, see HRP 309-WORKSHEET-Ancillary Review Matrix.

## **Lines of Communication**

Multisite studies involve communication among many stakeholders and, as a relying site study team, you will be responsible for developing clear lines of communication with the lead study team. The study protocol should include a communication plan that clearly describes the roles and responsibilities of the four main groups involved in multisite studies:

- Lead study team (including the lead PI)
- Relying site study team (UW study team and UW PI)
- Reviewing IRB
- Relying site IRB/HRPP (UW-Madison)

Some of the elements of a communication plan include:

- Who provides IRB documentation to relying sites as well as how and when
- How changes to the overall study and/or sites will be prepared and submitted
- Management of continuing review information
- Plan for handling reportable events

If the study protocol does not include a communication plan, you will need to work with the lead study team to understand the arrangements for communication across study sites (e.g., remote meetings, regular updates) and dissemination of study documents. We recommend that you consult with the study team as early as possible to discuss these arrangements. This will help reduce confusion about who is responsible for what and allow your study to run more smoothly.

Please keep in mind that while RELIANT provides support to UW-Madison study teams navigating reliance and institutional requirements for human research, we cannot answer questions from the lead study team about their own institutional requirements or IRB submission processes, including how to request that the lead study team's IRB serve as the reviewing IRB for UW-Madison. We encourage you to work closely with your collaborators to ensure they are in contact with their own IRB early in the reliance process; this will help make the review process move more efficiently.

## **How You Can Help with the Reliance Process**

RELIANT supports study teams by facilitating the reliance agreement process with other institutions. When the agreements are in progress, we track them closely and reach out to the other institution if the process is not moving efficiently. You can play an important role in helping the process go as smoothly as possible.

An efficient reliance process depends in part on clear communication between the lead study team and study teams at all relying sites throughout the course of the study. Working with the lead study team early on regarding their IRB's processes and procedures for adding and overseeing relying sites is important. Due to differences among institutional requirements and policies as well as experience with



reliance processes, the reviewing IRB's reliance process may differ from UW-Madison's and involve additional steps from the most common approaches to documenting reliance. The lead study team is responsible for communicating these requirements as well as steps in the reliance process to you.

In addition to regularly communicating with the lead study team, you may also want to consider:

- Reviewing information about the reviewing IRB's reliance requirements and processes; most IRBs have this posted on their websites.
- Reaching out to RELIANT when you have confirmed you will be a study site. We have experience with many external IRBs and are happy to provide you with any insights we have about the reviewing IRB and its processes.
- Reviewing sections in this manual about developing consent and authorization documents as a relying site so you know what to expect when you prepare your cede request.

## **Institutional Requirements**

Human research studies require exemption or IRB approval, but additional institutional requirements also need to be met before your study can begin. The most common of these are conflict of interest reporting and human research training requirements (including Good Clinical Practice, if applicable). Requirements like these are folded into the cede application review process, but others are not, such as radiation safety and joint security and privacy review (JSPR). RELIANT can assist you in identifying the institutional requirements that apply to your specific study, but you are responsible for obtaining those approvals or signoffs.

To assist researchers in navigating these institutional requirements and understanding when they might apply to their study, we have developed [HRP 309-WORKSHEET-Ancillary Review Matrix](#). We encourage you to review this prior to submitting your cede requests and to reach out to us with any questions.

## **Follow-On Submissions to Reviewing IRB**

After the reviewing IRB approves UW-Madison as a study site, it is primarily responsible for ongoing IRB oversight. This means that, apart from the exceptions noted in the section below, you do not need to report most follow-on submissions to the UW-Madison IRB. Although specific requirements may vary by IRB and you will need to work with the lead study team to understand those, general reporting parameters are:

- *Continuing review*
  - If your study requires continuing review, the lead study team is responsible for collecting from you any information the reviewing IRB requires for the continuing review application (e.g., enrollment numbers, subject complaints).
  - Neither continuing review information nor approval need to be provided to the UW-Madison IRB.
- *Changes*
  - Changes that affect UW-Madison's role in the study (e.g., revised study documents, changes in recruitment plans) need to be submitted by the lead study team to the reviewing IRB. The lead study team should work with you when preparing such a change.

- The only changes requiring reporting to UW-Madison are changes to:
  - Funding (adding or removing)
  - UW-Madison PI
  - Conflict of interest management plans (new or revised)
  - Protocol or documents affected by state law or institutional policy (e.g., fetal tissue, adding HIV testing, new HIPAA authorization document)
- Personnel changes other than for the PI should be completed using the Update Personnel activity form in ARROW. Please consult with the lead study team about whether these personnel changes also need to be reported to the reviewing IRB.
- *Reportable Events/Reportable New Information*
  - Reportable events should be reported by the lead study team to the reviewing IRB. You do not need to submit these to the UW-Madison IRB unless the reviewing IRB determines the event to be severe or the reviewing IRB requires you to report the event to us.
  - If the reportable event is of sufficient severity (e.g., serious noncompliance, unanticipated problem that poses substantial risks to subjects) and/or requires assistance from UW-Madison (e.g., post-approval monitor) to assess, the reviewing IRB is likely to reach out to RELIANT and we will follow up with you regarding next steps.
- *Study Closure*
  - When the study is complete at UW-Madison, you should submit a closure report here, even if the study remains open at other sites.

## **Follow-On Submissions to UW-Madison**

When UW-Madison has ceded IRB oversight to an external IRB, that reviewing IRB generally reviews all changes, continuing reviews, and reportable events for that study. This means you generally do NOT need to submit follow-on submissions (except as described below) for ceded studies for review by the UW-Madison IRB. Different IRB reliance agreements and reviewing IRBs, however, may require that certain submissions be reviewed by the UW-Madison IRB. RELIANT can assist you in determining whether any additional reporting is needed.

No fees are charged for UW-Madison review of follow-on submissions for ceded studies. Apart from personnel updates, however, all follow-on submissions that need reporting to UW-Madison also need to be submitted to the reviewing IRB. The reviewing IRB may charge fees for these follow-on submissions and commercial IRBs will always charge for such submissions. You are responsible for finding out what fees may be charged by the reviewing IRB.

Follow-on submission that need to be submitted to or completed at UW-Madison include:

- *Changes*
  - Change in PI
  - Updates to study team members (via the self-service personnel update activity)
  - Addition of new funding sources
  - Changes in conflict of interest management plans
  - Protocol or documents affected by state law or institutional policy (e.g., fetal tissue, adding HIV testing, new HIPAA authorization document)

- New sub-study protocol or new consent documents
- Changes to consent documents that alter UW-Madison’s required institutional language. Please see [HRP 502c-TEMPLATE-Institutional Consent Language](#) for those areas of the consent document that must use UW-Madison’s language.
- *Continuing Review*
  - All continuing reviews for ceded study are submitted to and reviewed by the reviewing IRB. No UW-Madison submission is required.
- *Reportable Events*
  - The UW-Madison IRB has no standing requirements for when reportable events for ceded studies should be submitted apart from the following:
    - Post-approval monitors (at UW-Madison or elsewhere) request an event be reported to the UW-Madison IRBs
    - The reviewing IRB requires an event be reported to the UW-Madison IRB
    - An event occurs of such severity or significance (e.g., serious and/or continuing noncompliance, an anticipated event that poses substantial risks to subjects or others) that the UW-Madison IRB will be assisting the reviewing IRB in addressing the event
- *Study Closure*
  - A study closure must be submitted to both the reviewing IRB and the UW-Madison IRBs when a ceded study is completed.

## Principal Investigator Responsibilities

When the UW-Madison agrees to cede IRB oversight for a study to an external IRB, the UW-Madison study team must still comply with relevant UW-Madison requirements. Study teams also must be familiar with the requirements of the reviewing IRB, which may be different from what might be required by UW-Madison. Several of these requirements must be met before the UW-Madison can agree to cede IRB oversight. These responsibilities and requirements include:

- The UW-Madison PI for the study must fulfill the responsibilities described in [the HRP-103-Investigator Manual](#).
- Study teams must ensure that all study team members complete and maintain current human participant research training certification and, if applicable, Good Clinical Practice training certification. All UW-Madison study team members must have complete and current training certifications before IRB oversight can be ceded to an external IRB.
- If applicable, UW Carbone Cancer Center Protocol and Monitoring Committee (UWCCC PRMC) review must be completed before IRB oversight can be ceded to another IRB.
- Study teams must adhere to the requirements of any UW-Madison ancillary reviews (e.g., conflict of interest, biosafety, Clinical Research Unit), as applicable. If ancillary committee review is required, this may need to be completed before IRB oversight can be ceded to an external IRB. For more information, see [HRP 309-WORKSHEET-Ancillary Review Matrix](#).
- If study activities will involve UWHC personnel and/or occur at UWHC facilities, study teams are responsible for following UWHC policies.
- Study teams are responsible for ensuring that all budgetary and contractual issues relevant to the UW-Madison’s conduct of the study are resolved before starting their research.

- Study teams are responsible for ensuring language in consent forms (e.g., compensation for injury) does not conflict with clinical trial agreement or other funding agreement.
- Study teams are responsible for ensuring required agreements for data or biospecimen transfer (e.g., data use agreements, material transfer agreements) are in place prior to the UW-Madison receiving or transferring data or biospecimens. For more information, see the Data Transfer and Use Agreement section below.
- UW-Madison study teams are responsible for providing Research and Sponsored Programs (RSP) with documentation that a study has been ceded to and approved by an external IRB. For additional guidance, see [Research and Sponsored Programs \(RSP\) Release of Grant Funds When Studies Are Ceded to Another Institution's IRB for Review and Approval](#).
- The UW-Madison study team cannot begin any research activities for a study ceded to an external IRB until the reviewing IRB has formally agreed to assume IRB oversight (e.g., the IRB of record has signed an IRB authorization agreement) and the reviewing IRB has approved the UW-Madison's involvement in the research. In addition, study activities cannot begin until all institutional requirements are met and approvals obtained, as applicable for each study.
- Study teams must report to the reviewing IRB any changes, reportable events, and continuing review progress reports in accordance with the reviewing IRB's policies and procedures. Reporting for some types of submissions may also need to be submitted to the UW-Madison IRB. For more information, see the Follow-On Submissions sections above.
- Potential unanticipated problems, subject injuries, significant subject complaints, or noncompliance that occur at UW-Madison or UWHC may need to be reported to the UW-Madison IRB in addition to the reviewing IRB. Study teams should contact [RELIANT](#) for guidance when such an event occurs. NOTE: For studies that rely on the National Cancer Institute's Central IRB (NCI CIRB), only serious noncompliance incidents are submitted to the NCI CIRB. For more guidance, see [National Cancer Institute Central Institutional Review Board \(NCI CIRB\) Algorithm to Assess Potential Noncompliance](#).

## **OTHER**

UW-Madison IRBs participate in a variety of IRB reliance partnerships, all designed to streamline the IRB review process for multisite and collaborative research studies. The status, scope, and process for each reliance partnership differ. Please see below for additional information on each partnership and please contact RELIANT ([irbreliance@wisc.edu](mailto:irbreliance@wisc.edu)) with any questions.

### **UWHC Partners/Affiliates**

The UW-Madison IRBs have an agreement in place to serve as IRB of record for University Hospital and Clinics therefore no additional agreements need to be in place for UW-Madison IRBs to serve as IRB of record for studies involving the hospital. Additional agreements are in place between UW-Madison and the following entities:

- University of Wisconsin Medical Foundation
- Morgridge Institute for Research

Please contact RELIANT ([irbreliance@wisc.edu](mailto:irbreliance@wisc.edu)) for additional information.

## **UPH-Meriter**

While UW Health has a partnership agreement with Meriter, this agreement does not encompass human research and Meriter still has its own IRB. For studies involving UnityPoint Health-Meriter, please work with RELIANT and the Meriter IRB office to determine the best IRB of record for your study.

## **Swedish American**

While UW Health has a partnership agreement with Swedish American, this agreement does not encompass human research and Swedish American still has its own IRB. If you are interested in conducting research at Swedish (including using or accessing medical records), please contact RELIANT ([irbreliance@wisc.edu](mailto:irbreliance@wisc.edu)) for help.

## **VA Requirements**

UW-Madison does not have the authority to cede review to another IRB on behalf of the Madison VA nor to agree to serve as the reviewing IRB for any external sites involved with a VA study or any VA sites study teams may want to add to a non-VA study. Please contact the Madison VA Research Office first for assistance in determining whether single IRB review can be used for your study.

## **Sending or Receiving Specimens**

When UW-Madison sends, the first step is to determine if the receiving institution is engaged in human research. The study team receiving specimens from UW-Madison will need to consult with their own IRB regarding an engagement determination. If the IRB at the recipient site determines that it is engaged in human research, then a reliance agreement may be appropriate if the project does not qualify for exemption. Again, the IRB at the recipient site should advise their study team on whether the project qualifies for exemption.

For UW-Madison study teams receiving specimens from other sites, similar assessments will need to be made to determine whether UW-Madison is engaged in human research and, if so, what kind application is needed, including whether IRB review can be ceded to another institution.

For more information on sending or receiving specimens, see [HRP-103-Investigator Manual](#).

## **Data Transfer and Material Use Agreements**

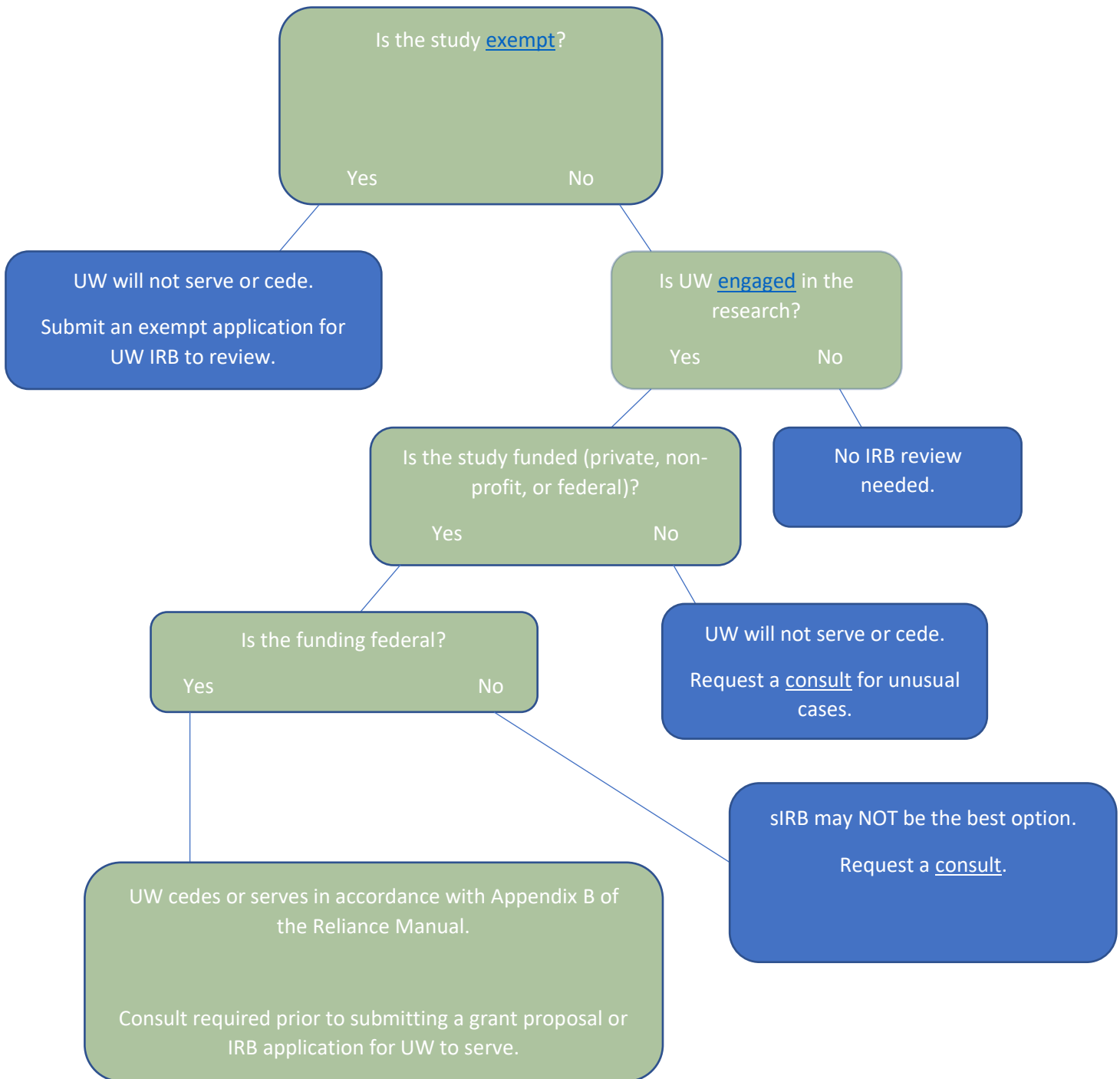
Study teams are responsible for ensuring required agreements for data or biospecimen transfer (e.g., data use agreements, material transfer agreements) are in place prior to the UW-Madison receiving or transferring data or biospecimens. Data Transfer and Material Use Agreements (DTUA and MTA) are separate from IRB review. The need for a DTUA and/or MTA is not affected by using a single IRB; these are institutional requirements that apply regardless of reviewing IRB. For more information, see [HRP-103-Investigator Manual](#) and [HRP-309-WORKSHEET-Ancillary Review Matrix](#). Also see the [Guidance on External Sharing of Human Subjects Research Data page](#).



## APPENDIX A: Flowchart When UW will Cede or Serve

This flowchart explains when UW-Madison will cede IRB review or serve as the reviewing IRB. This applies only for projects involving [HUMAN SUBJECTS RESEARCH](#) and multiple sites.

See Reliance Manual for more information, and/or request a consult with RELIANT.



## APPENDIX B: Single IRB Review Requirements

### UW-Madison sIRB Review Requirements

December 2021

Certain criteria must be met for UW-Madison to serve as the reviewing IRB (sIRB) or to cede IRB review to an external IRB. If your study does not meet the criteria below, RELIANT will assist you in determining whether sIRB review is the best option for your study and, if so, which IRB can provide oversight. (See also the [Unusual Cases](#) section of the Reliance Manual.)

Serving as sIRB	Ceding IRB review to External IRB
<p>Study must meet the following criteria:</p> <ul style="list-style-type: none"> <li>• Funded (e.g., federal, or non-profit)</li> <li>• <a href="#">Non-exempt</a></li> <li>• UW is <a href="#">engaged in human subjects research</a></li> <li>• Relying sites are AARHPP accredited or have a robust Human Research Protection Program</li> </ul> <p><a href="#">Consult</a> required prior to submitting a grant proposal or IRB application. At the consultation, the following considerations will be discussed:</p> <ul style="list-style-type: none"> <li>○ Type of funding</li> <li>○ Number, location, and type of sites</li> <li>○ Review time requirements</li> <li>○ Accreditation status of sites</li> <li>○ Conflict of Interest considerations</li> <li>○ Scientific review</li> <li>○ UW study team administrative support</li> <li>○ <a href="#">Fees and budget considerations</a></li> </ul>	<p>Study must meet the following criteria:</p> <ul style="list-style-type: none"> <li>• Funded (e.g., federal, or non-profit)</li> <li>• <a href="#">Non-exempt</a></li> <li>• UW is <a href="#">engaged in human subjects research</a></li> <li>• Reviewing IRB is AARHPP accredited or has a robust Human Research Protection Program</li> </ul> <p><a href="#">Consult</a> required prior to submitting cede application where:</p> <ul style="list-style-type: none"> <li>○ Fetal tissue research will be conducted at UW-Madison/UWHC</li> <li>○ The study involves the William S. Middleton VA Hospital</li> </ul>



## **APPENDIX C: IRB Liaison Job Description**

Working Position Title: IRB Liaison

Estimated Full Time Equivalent (FTE): Depends upon the complexity of the study and the number of sites. It is estimated that most studies with 10 or more sites will require 1.0 FTE dedicated to this role. Smaller studies may be able to combine this role with another role such as general study coordination.

Summary of job duties:

The IRB Liaison will work directly with the overall study/lead UMN PI as part of the lead site team in order to facilitate and coordinate IRB review and other compliance requirements across all participating sites of a multi-site clinical trial. The IRB Liaison will serve as a central hub for communication among sites as well as between the sites, the IRB and other compliance offices. This liaison will serve as the primary point of contact between the reviewing IRB and the overall study.

Primary duties may include:

- Understand and communicate the policies and processes of the reviewing IRB, and be familiar with the research and the sites
- Work with the sites and their research compliance or IRB offices to establish reliance agreements with the reviewing IRB
- Coordinate the timing of initial review and modifications across all sites
- Assist the participating sites with completing and submitting materials to the reviewing IRB, which may include preparing and submitting all materials on their behalf
- Facilitate the continuing IRB review for the entire study by collecting information from all sites and submitting it to the reviewing IRB
- Serve as an intermediary between the reviewing IRB and the participating sites
- Obtain local context considerations (e.g., a state's age of majority) for each site and ensure that the information is provided to the reviewing IRB
- Assist the participating sites with responding to IRB requests
- Plan IRB and other regulatory approval timelines and troubleshoot challenging situations
- Coordinate the payment of IRB fees by the lead site
- May require travel in order to accomplish job duties, e.g., when assisting a participating site in responding to an inspection request from the reviewing IRB

Qualifications:

Because this is a crucial role that requires a complex set of skills, the most qualified individuals will have significant regulatory experience related to multi-site studies and/or clinical trials. This person needs a strong knowledge of the regulatory requirements for single IRB review and must be able to nimbly respond to changes in the implementation of this new policy across many different institutions. They also need to have enough scientific and regulatory background to understand the study and anticipate other regulatory and institutional requirements that may apply at each site and affect the IRB process (e.g., Radiation Safety review, Institutional Biosafety Committee review, etc.). The IRB liaison will need to establish relationships and maintain close communications with a wide variety of people and offices quickly. Outstanding demonstrated ability to communicate quickly and effectively with a wide range of stakeholders is strongly recommended.

Suggested Additional Qualifications:

- Specific education or training in biomedical regulatory affairs
- Project management experience or certification for grant applications

Grant Budget Justification Example:

TBN, Research Study Coordinator/IRB Liaison

Effort = 12.0 months calendar (100% FTE) in Years 1-5 [adjust FTE & years to match the study]

A Research Study Coordinator will be hired to serve as the IRB Liaison for all participating sites in order to facilitate the complex and time-sensitive communications among sites, and between the participating sites and the single IRB (sIRB). Under the direction of the Lead PI, the IRB Liaison will facilitate and coordinate IRB approval and related regulatory compliance activities for all participating sites. This includes serving as an intermediary between the sIRB and the sites in order to: (1) establish reliance agreements; (2) facilitate timely initial review, modifications, and continuing review; and (3) establish and maintain communication plans among all stakeholders to ensure consistency among IRB-approved consent forms, other materials, and procedures among all sites.

## APPENDIX D: Communication Plan Template (HRP-830 WORKSHEET Communication and Responsibilities)

The purpose of this worksheet is to provide support for the Investigator or Study Team when developing a communication plan and identifying roles and responsibilities of the Reviewing IRB, Relying sites and/or the Overall PI or Lead Study Team.	
<b>Study-Specific Responsibilities</b>	
Training & Qualifications: Providing the reviewing IRB with confirmation that study teams at relying sites have completed relevant trainings and are qualified to conduct the proposed research.	Relying Study Team and Relying Site/IRB Contact
Local Context Information: Providing local context information (e.g., consent language, local laws, institutional requirements) to the lead study team and reviewing IRB.	
Conflicts of Interest: Providing any determinations, prohibitions, or management plans from the relying institution to the lead study team and reviewing IRB	
Ensuring organizational compliance with the requirements of other parts of the local HRPP and communicating to the reviewing IRB. This includes obtaining approval from other internal review committees prior to IRB approval.	
Templates: Providing study document templates (e.g., consent forms, recruitment materials) to participating sites.	<input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
IRB Application Materials: Preparing and submitting the study materials for initial or continuing review or submitting modifications to the sIRB, and providing the approved material to relying site.	<input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
Site-specific Materials: Preparing and submitting site-specific materials to the sIRB.	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
IRB Determinations and IRB-Approved Documents: Providing sIRB determinations and approved study materials to participating sites.	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
Policies of the sIRB: Providing the lead study team with all relevant sIRB policies	<input type="checkbox"/> N/A <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
Registering at clinicaltrials.gov	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team

	<input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
pSite Continuing Review Information: Obtaining and collating CR information from all participating sites.	<input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
Reportable New Information: Reporting RNI information to the sIRB for participating sites.	<input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
Closing a Study: Reporting study closures to the sIRB	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
Obtaining any additional approvals from DHHS when the research involves pregnant women, fetuses, and neonates; or children; or prisoners	<input type="checkbox"/> Reviewing IRB <input type="checkbox"/> Relying Site/IRB Contact <input type="checkbox"/> Lead Study Team <input type="checkbox"/> Relying Study team <input type="checkbox"/> Other:
Notes:	

## APPENDIX E: Unusual Circumstances, Serving and Ceding

### Unusual Circumstances: Serving

It may be appropriate for UW-Madison (when engaged) to serve as the reviewing IRB for circumstances not described in the sIRB decision tree or Appendix B of this manual. Examples and considerations include:

- *Community partners:* Regardless of whether a study is funded, it may be appropriate for UW-Madison to serve as the reviewing IRB for community organizations or individuals. Considerations include:
  - Type of research activities that will be performed
  - Qualifications of the community partner to conduct human subjects research (i.e., resources and any necessary study/role specific tasks)
  - Location of study sites (e.g., outside of Wisconsin)
  - Ability to meet UW-Madison training and conflict of interest requirements
- *SBIR/STTR funded studies:* It may be appropriate for the UW-Madison to serve as the reviewing IRB for studies funded via SBIR/STTR grants. Considerations include:
  - Role of the external entity in the study
  - Qualifications of external personnel to conduct human subjects research
  - Timeframe for obtaining IRB approval
  - Appropriate mechanism for conflict of interest review as well as human subjects research training
- *Sites with an IRB but without AAHRPP accreditation or a robust HRPP:* It may be appropriate for the UW-Madison to serve as the reviewing IRB for sites that are not accredited and do not have a robust HRPP in limited circumstances. Considerations include:
  - Role of the external entity in the study
  - Overall study is minimal risk
  - Qualifications of external personnel to conduct human subjects research
  - Appropriate mechanism for conflict of interest review as well as human subjects research training
  - Staff at the site who provide dedicated support to their IRB and are knowledgeable about single IRB arrangements. Staff also must be responsive to queries from the UW-Madison HRPP

### Unusual Circumstances: Ceding

It may be appropriate for the UW-Madison to cede IRB review for circumstances not described in the sIRB decision tree or Appendix B of this manual. Examples and considerations include:

- *Sites with an IRB but without AAHRPP accreditation or a robust HRPP:* It may be appropriate for the UW-Madison to cede review to IRBs that are not accredited and do not have a robust HRPP in limited circumstances. Considerations include:
  - Role of UW-Madison in the study
  - Overall study is minimal risk
  - The site holds a federal-wide assurance (FWA)

- The site has policies that address how IRB review is conducted, including those that are most applicable to the study (e.g., enrollment of children or other vulnerable populations)
- The IRB has appropriate expertise and qualifications to review the study
- Staff at the site who provide dedicated support to their IRB and are knowledgeable about single IRB arrangements. Staff also must be responsive to queries from the UW-Madison HRPP.