TOWARDS A SEAMLESS REVIEW OF MULTINATIONAL HUMAN SUBJECTS RESEARCH:

Experience from the PHFI-Emory Center Of Excellence Partnership

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Role of IRB/IEC and problems in review of collaborative research

Haitian researcher, Jean Pape, describes issues in the IRB process:

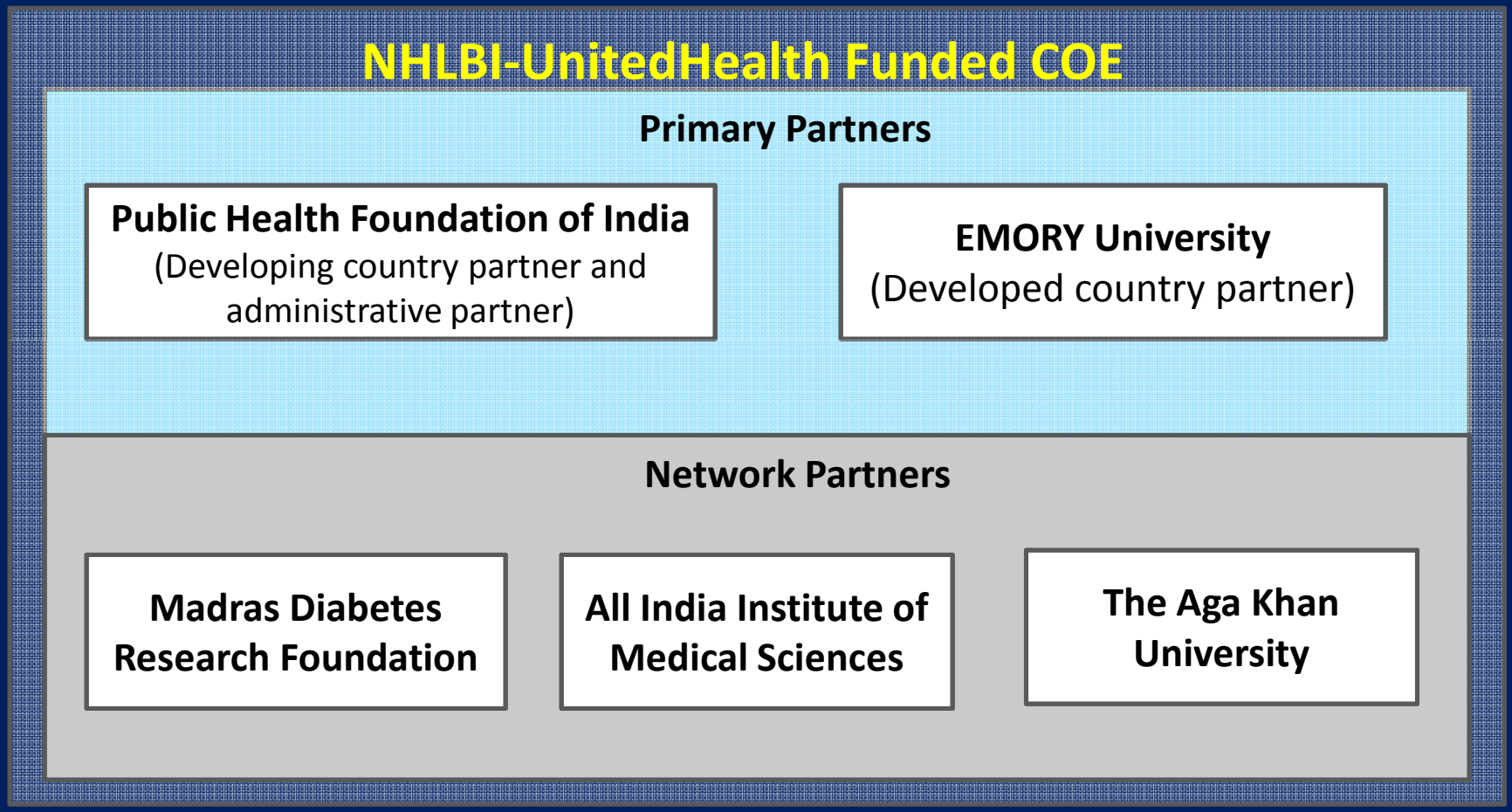
"...for any given project there are **multiple IRB clearances**. Each **IRB meets** once a month at different times. Each IRB uses **different presentations and consent forms.** Each IRB has a **different set of rules**. Some accept **oral consent**. Others, **written consent**. Others written consent with **witnesses**, without witnesses. And depending on who the witnesses are, each IRB responds with different **comments** that must be addressed, a different **time period** for approval and, therefore, different time for yearly **renewal**." [1]

Role of IRB/IEC and problems in review of collaborative research

- The critical role of an IRB/IEC is "to facilitate ethical human subjects research by assuring the rights and welfare of study participants".[2]
- Implementation of universal guidelines for ethically-engaged research vary across cultures.[3,4] US government –funded research, regardless of location must conform to 'Common Rule'.[5]
- Increasing inter-institutional and international research collaboration:
  - Multi-country, multi-site IRB review needed.
  - Human subjects' protection programmes vary a great deal in scope and capacity.[6]
  - Duplication of efforts, wastage of time, resources, inappropriate delays - very likely provide relatively few benefits[7]

Center of Excellence Network

Public Health Foundation of India (PHFI), New Delhi, India and Emory University, Atlanta, USA
Centre for cArdio-metabolic Risk Reduction in South Asia (CARRS)



Role of the COE - Development of collaborative research projects, with focus on building capacity for complex multicenter investigations.

Figure 1

COE - Ethics review experience

Complex nature of multicenter studies, often with global collaboration, have presented numerous challenges in ethics review:

- Delays in review process
- Multiplicity of IRB/IEC approvals; e.g. one trial needed review by up to 13 different IRBs (Figure 2, next slide). Issues with consent form/language
- Differences in processes and documentation
- Need for certification of training in the responsible conduct of human subject research
- Differences in cultural interpretations
- Issues with local and national governments and other approvals

COE - Ethics review experience

Multiplicity of IRB/IEC approvals; CARRS Translation Trial needed review by up to 13 different IECs

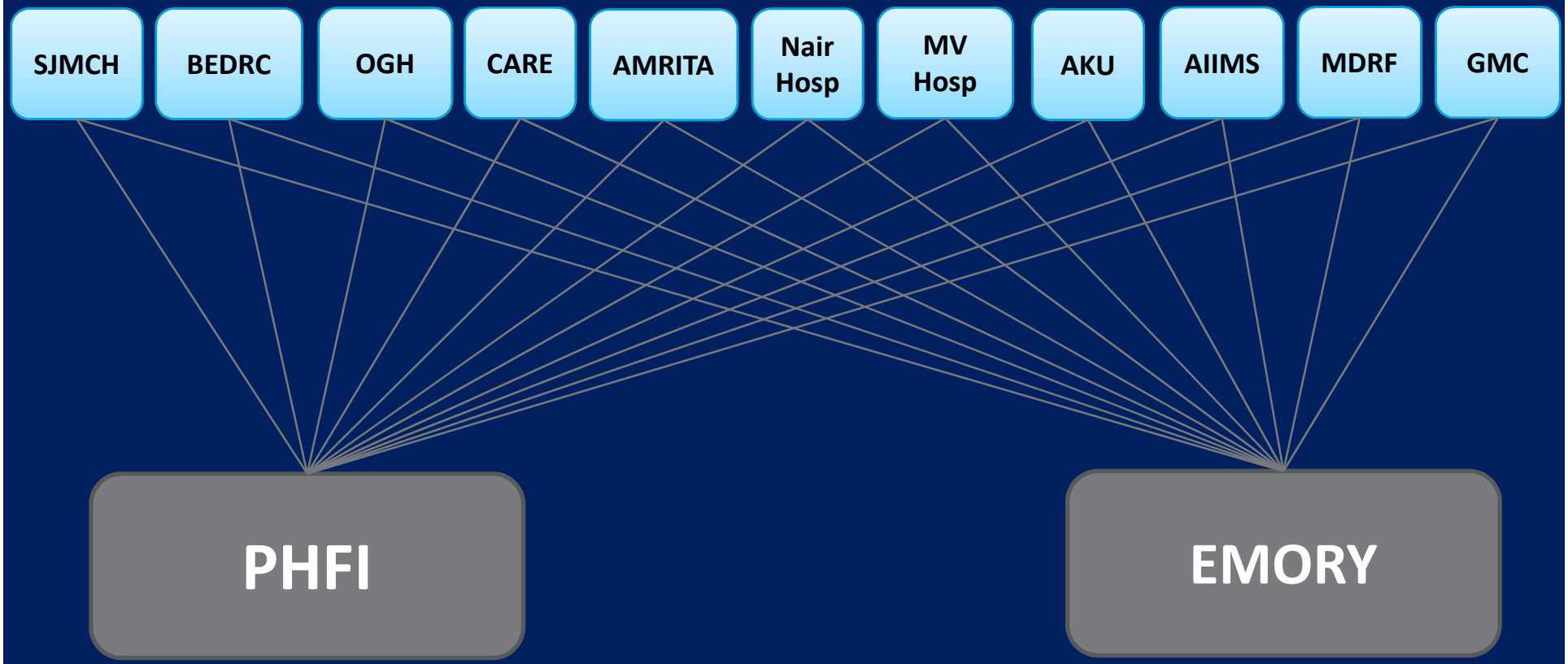


Figure 2

The Project

Objective

To develop, pilot, and implement a process of seamless, thorough, efficient and respectful parallel review of human subjects research to facilitate the implementation of complex, multi-institutional federally-funded human subjects research, being developed by the NHLBI/UnitedHealth funded Center of Excellence for Prevention and Control of Cardio-metabolic Diseases in South Asia.

Major Project Activities

A I) Fact-finding:

a) A Case Study of the CARRS Translation Trial Study:

- Challenges:
  - Inadequate communication among COE IRB/IECs;
  - Logistical obstacles; delay due to need for successive reviews;
  - Lack of precedence

- Impact on research process:
  - Delays in study implementation timelines

- Looking back on the experience, a U.S.-based investigator described it as “frustrating”, but also an important “learning process”

- One Indian interviewee explained that the Federal-wide Assurance (FWA) was a “new and unfamiliar” process for non-U.S. organizations

Suggestions for improving multi-center IRB/IEC review process from the case study:

- Exchange visits between partner IRB/IECs
- Experience-sharing and training exercises
- Designation of point person from each IRB/IEC for direct communication
- Issuance of conditional approval for the protocols, pending local IEC approval

b) Workshop for identification of major differences between partner organizations' ethics review processes (11 attendees)

Following themes emerged:

- Marked differences in IEC composition noted
- All partner institutions IECs under-resourced
- Development of an efficient IRB/IEC system among institutions required
- Training requirement for adherence to US regulations when reviewing and conducting US federally-funded research (FWA)
- Deferral of review to another institution using IRB Authorization Agreements (IAA) advantageous

A II) Training workshops for COE IEC members

1st IRB Human Subjects Review Training workshop in May 2011:

(9 attendees)

- Discussion on how to achieve smoother interactions between the ethics review committees
- Training on human subjects review

2nd Ethics training workshop on 8th Nov, 2011

A III) Piloting of parallel review of continuing reviews and amendments

A IV) Other activities:

- COE IRB/IEC member-secretary network
- Dissemination plans

Initiation of parallel ethics review - Results

- A communication loop established between two point persons at PHFI and Emory IRB/IECs:
    - Increased efficiency and coordination
    - Identification of ways to minimize time

- Role of point persons of IRB/IECs in the parallel review:
    - Preliminary screening of documents
    - Sharing of application and documents
    - Communication and submission

- Few issues
    - Emory has online submission - PHFI yet to move to online
    - Screening for processing simultaneously?
    - Common form?

Observations during parallel review of an amendment:

- ".. seamlessness and efficiency needs to start with application preparation."
- "Research teams need to confirm with each other exactly what is being submitted, even reviewing each other's submissions, before putting them in process."
- "Would it be better to have a single set of documents for the amendment?"
- "More-than-one-year IRB approval periods" and different expiration dates.
- "The point of the parallel administrative and then member review is to make sure that any required changes are communicated to the other partner in real time so that we don't go up and down the chain."

Important to remember that this is a parallel review, not joint review so each IEC/IRB remains independent.

Conclusion

- Enhanced communication between COE IRB/IECs - key to providing efficient and timely review of collaborative human subjects research
- Importance of training for adherence to US regulations when reviewing and conducting US federally-funded research (FWA) for non-US organizations
- Deferral of review to another institution using IAA may be beneficial
- Partner institutions' IECs under-resourced
- The project builds partner institution capacity to conduct human subjects review of protocols in accordance with the NIH requirement and ensures that recipients of US federal funding conform to the Common Rule
- This model can be used for any other bilateral or multilateral research collaboration

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