The University of Michigan (U-M) now offers an additional option of ceding IRB oversight of industry sponsored late-phase clinical trials for U-M researchers. The U-M IRB has finalized contractual and regulatory ceding agreements with several Central (independent/commercial) IRBs. Use of Central IRBs avoids duplicative review by multiple IRBs and promotes consistency of review across IRBs; this may ultimately decrease time to initiation of the clinical trial. It is important to note the University of Michigan, as a local site, still maintains certain oversight requirements for the conduct of the trial and requires submission of materials via the Proposal Management and Regulatory Management eResearch systems in order to enter the trial into the appropriate workflows.

General Ceding Questions:

1. **What is a Central IRB?** A Central IRB is a single IRB that provides regulatory and ethical review services for multiple sites participating in a research study. A Central IRB may be independent (sometimes called commercial) or institutional.
   - Independent IRB – U-M has Master Services Agreements with the following: Chesapeake IRB, Western IRB, Schulman Associates IRB, Quorum Review, & NCI CIRB.
   - Institutional IRB – for example, non-UM University or Hospital IRB.

2. **What does it mean to cede oversight?** Ceding is established through an IRB agreement that delineates responsibilities between the entities. To cede oversight of research, the U-M IRB must agree to relinquish certain responsibilities and the Central IRB must agree to assume those responsibilities. This may be accomplished via:
   - IRB Authorization Agreement – (with institutional IRBs) that include IRB regulatory terms
   - Master Services Agreement – (with independent IRBs) containing contractual terms and responsibilities

3. **Can the U-M IRB be the Central IRB (IRB-of-Record) for the multiple sites in my project?** At the present time this option is not available.

4. **May investigator-initiated research at U-M utilize a Central IRB?** At this time, ceding of oversight by U-M to an central IRB is limited to industry-sponsored research, phases III and IV where the central IRB will provide the project oversight and U-M will be added on as a performance site or for NCI-CIRB clinical trials (all phases).

5. **Will we be able to use an central IRB for federally funded research projects?** At this time, only multi-site, industry-sponsored, phases III and IV clinical trials may be ceded to an central IRB as part of the Master Services Agreement. The exception to this is NCI-CIRB clinical trials, which includes all phases.

6. **What is the fee schedule for using a Central IRB?**

- Central IRBs will charge a fee which is usually paid by the research sponsor. The billing process will vary depending on the Master Services Agreement with the central IRB. Work with the sponsor to determine how the fee will be incorporated into your study budget.
- University/Institutional IRBs typically do not charge a fee.

7. **How do study teams request the use of a Central IRB?** Study team creates a Clinical Trial Routing Form (CTRF) and indicates which central IRB will be used. In eResearch Proposal Management (eRPM), study teams must indicate on the PAF Application which Central IRB will be used. In eResearch Regulatory Management (eRRM), complete the "Requesting Review by a Non-UM IRB" (aka Ceding) application. The ceding application will be reviewed by the ancillary committees, and reviewed and acknowledged by the U-M IRB. If interested in initiating an Institutional IRB request, please call 734-763-4768, and ask to speak with the Agreements Coordinator.

8. **If IRB oversight is ceded to an external IRB, why is it necessary to submit anything via eResearch Regulatory Management for this project?** Although the project is under the primary oversight authority of an external IRB, the project must be submitted in the eResearch system through the application type (Section 1-1.1) entitled *Requesting Review by a Non-U-M IRB*. The application must be reviewed by the U-M IRB and any applicable ancillary committees for the local context review and an acknowledgement issued. The project must remain active in the eResearch system via a Scheduled Continuing Review submitted annually.

   An amendment must be submitted for changes to the U-M study team members, if the project is placed on a hold or suspended, or if a project change may impact either the ancillary review or the decision to cede the project to the external IRB. An AE/ORIO must be submitted for:

- Related serious adverse events that occur in U-M subjects
- Unanticipated problems that occur in U-M subjects
- Serious and/or continuing non-compliance determinations made regarding the U-M site

In addition, when the project is completed, the project should be terminated in eResearch.

9. **What is the local context review that U-M needs to conduct even if they cede IRB oversight?** The local context review includes the following:
   a. Local ancillary committee reviews as applicable (e.g., pharmacy, radiation safety, clinical billing, conflict of interest or PRC).
   b. Ensure that the U-M study teams are appropriately qualified, and have completed educational requirements, i.e. PEERRS.
   c. Local analysis of any specific requirements of state or local laws, regulations, policies, standards (social or cultural) or other factors applicable to the study.
   d. Identify if the project has changed status and would no longer be appropriate for ceding IRB oversight.

10. **How will utilizing a Central IRB impact study teams should the study be subject to an audit or inspection?** Study conduct and regulatory recordkeeping requirements remain unchanged. Study teams should continue to keep regulatory binders. Study teams should contact the Central IRB and the U-M IRB if notified of an impending audit or inspection.

11. **Will we be able to migrate previously approved qualifying research applications from the U-M IRB oversight to a Central IRB?** At this time, ceding oversight is limited to new research applications.

PROCESS QUESTIONS

1. **Should the** Requesting Review by a Non-UM IRB (aka Ceding) application **be used for NCI-CIRB research projects instead of the facilitated review applications?** Yes.

2. **How will the review and acknowledgement process work at U-M IRB**? When a Ceding application is submitted in eResearch, the U-M IRB will receive an early alert. As the application is routed through the standard Ancillary Committee(s) review and approval process, the U-M IRB will perform a preliminary review. Once all ancillary reviews are complete, the U-M IRB will conduct a final assessment for regulatory compliance under the ceding agreement and issue an acknowledgement indicating that U-M initial review is complete and that oversight may be ceded.

3. **How long will it take for Ancillary Committee review to be completed?** Ancillary review occurs outside of the U-M IRB and remains unchanged. If you have questions regarding review times please contact the appropriate Ancillary Committee.

4. **How long will it take for an the U-M IRB acknowledgement letter to be issued?** Once all agreements are in place and all U-M reviews are complete, the U-M IRB acknowledgement should take approximately 2-3 business days. Timeframes may vary depending on negotiation of terms.

5. **How does the approval period work?** At this time, the U-M IRB acknowledges the ceding application. In order to make the process more efficient and to allow easier tracking of ceding applications, an expiration date is set to match the most recent expiration date from the IRB of record. Federal regulations require standard human subjects research projects to receive continuing review at least annually.

6. **As part of the ceding application, does the U-M IRB need to review the consent and/or recruitment materials?** Consent and available recruitment materials should be uploaded as part of the ceding application. The U-M IRB will review the materials for compliance with local context language.

7. **Where do I obtain the informed consent document for my project?** Contact the sponsor or Central IRB for a copy of the informed consent document. There is additional U-M specific language that must be included in all informed consent documents. Please contact the U-M IRB for questions related to this process.

8. **How do consent documents get translated into foreign languages?** Please contact your Central IRB for questions regarding translating your ICF.

9. **How will a billing calendar be developed for this project?** Ancillary review at U-M has not changed under the ceding application. When indicated, CRAO will still review the billing calendar.

10. **How do I report my enrollment numbers to U-M if I have an approved ceded application?** Study teams are required to utilize MBECT for clinical trials. In addition, at the time of Scheduled Continuing Review (SCR), you will be asked to summarize your enrollment activity over the most recent interval for your ceding application.

11. **After initial approval, how do you process ongoing issues? If special circumstances exist, such as needing an eligibility waiver, process for emergency deviations, use of online consent, use of brief consent forms?** Refer to the documentation provided by the Central IRB.

12. **Can I use central IRB as a one-off to cover U - M as IRB-of-Record for a particular project that is not using an central IRB as an IRB-of-Record? The sponsor said would be okay and the central IRB said they are okay with it too.** No, the use of an independent IRB is meant for industry sponsored, Phase III or IV, multi-site clinical trials where the sponsor has identified a central IRB to be the IRB-of-record for the project. In these cases, the U-M will be added as a performance site to a project already being overseen by the central IRB. In rare instances, the U-M IRB will consider exceptions. Please contact the U-M IRB for further information.