# Relying on an External IRB: Follow-On Submissions

The following guidance is intended to give information on what must be submitted to OHRS after the New Protocol Application has been approved.

As a reminder, when DF/HCC sites chose to rely on an external IRB, the IRB review is the only aspect of the protocol review being completed by an external group. Depending on the type of submission, all other reviews (e.g., feasibility, ancillary, and scientific reviews) may still occur at DF/HCC and must be considered as part of the timeline of submission.

## Post New Project Application Submissions

After the NPA has been acknowledged in iRIS, and the study activated, any additional follow-on submissions must still be submitted in iRIS.

| iRIS Application | Required | Use, if appliable |
|---|---|---|
| Administrative Modification | | • |
| **CTEP Amendment (NCI CIRB studies)**<br>• *IRB of Record: NCI CIRB* | | • |
| Event Application | | • |
| Progress Report | • | |
| **sIRB Amendment**<br>• *IRB of Record: Any IRB other than NCI CIRB* | | • |
| **Study Completion** | • | |

The external IRB will continue to have the primary responsibility for the ongoing IRB oversight of the research. Post NPA submissions are reported to OHRS to ensure up-to-date documentation of changes in the study and if any additional feasibility, ancillary, or SRC reviews are necessary.

## Administrative Modification

Research teams are required to submit Administrative Modifications in iRIS. Similar to studies that rely on the DFCI IRB, the purpose of Administrative Modification forms is to provide outside interest logs, updated pharmacy manuals, and investigator brochures. If the revised pharmacy manual or investigator brochure impacts the protocol document and/or consent form, the research team must submit this as an amendment with the external IRB approval of the changes.

## Amendment

Changes to ceded research must be submitted to the external IRB by the sponsor or study team, if the changes affect the research occurring at DF/HCC sites. OHRS recommends that research teams submit protocol modifications to the external IRB before submitting the amendment in iRIS. Once the external IRB

has approved the proposed changes, the DF/HCC research team must submit either a Cancer Therapy Evaluation Program (**CTEP**) or single IRB (**sIRB**) **amendment** in iRIS if the changes impact how the research is being conducted at any of the DF/HCC participating sites.

## Proposed Changes

The following includes, but is not limited to, examples of proposed changes that need to be submitted to the DFCI IRB.

- Addition of New Funding Sources
- Change in overall or local accrual numbers
- Change in enrollment status
- Change in Principal or Site Investigator
- Change in Study Title
- Consent Form Changes
- Protocol document revisions
- Revisions to Local Boilerplate Language

Research teams should contact OHRS if they are unclear whether an amendment should be submitted to DFCI, or if the proposed changes will require SRC review.

## Single IRB (sIRB) Amendment

For research that cedes IRB oversight to an external IRB other than the NCI CIRB, research teams must use the sIRB Amendment Form. Once submitted, the sIRB Amendment will flow to the sIRB Triage Committee queue to be routed for SRC and ancillary reviews based on the submission components. The form will route to the appropriate feasibility review and sign-off committees depending on how it has been completed. Please make sure to indicate the IRB of record when completing the amendment form.

## Cancer Therapy Evaluation Program (CTEP) Amendment

For studies that have ceded to the **NCI CIRB**, research teams are required to use the CTEP Amendment form for any future amendments. This form routes automatically to the applicable feasibility, ancillary, and IRB committees. Like NPAs reviewed by the NCI CIRB, CTEP amendments do not route to the SRC for review. This routing mechanism assists research teams and administrative staff in streamlining the activation process of these amendments to meet the CTEP 30-day activation timeline. To meet the 30-day activation timeline, all NCI CIRB amendments posted to the Clinical Trials Support Unit (CTSU) website must be submitted within five (5) calendar days of receipt in iRIS using the CTEP Amendment Form.

In the CTEP Amendment Form, the research team will see three (3) dates:

- Date Posted to CTSU
- Required Local Activation Date
- Amendment Version Date

Research teams must calculate the Required Local Activation Date. This date is 30-calendar days from the date that the amendment approval was posted to the CTSU website, including weekends, vacations, and scheduled holidays.

Even if the research team is submitting an editorial or administrative change that does not require NCI CIRB review, the research team must use the CTEP Amendment. However, the three (3) important dates do not

need to be filled out in the CTEP Amendment Form. Please make sure to include the IRB of record in the amendment form.

## Progress Reports

Prior to the IRB expiration date listed in iRIS and OnCore, research teams should submit the Progress Report Form. Research teams will be prompted to provide the current status of the research, the overall DF/HCC accrual, and any other pertinent documents. OHRS requests that the Progress Report be submitted at least 10 business days before the study expiration, however documents should be submitted only after the IRB of record has provided the extended approval period.

As part of the Progress Report, OHRS will review the following:

- Confirmation of continuing review approval by the IRB of record
- Local accrual
- The minor deviation/violation log for each DF/HCC site as applicable. This log will be reviewed by OHRS to ensure the research team has appropriately reported any issues to the IRB of record.
- Check Good Clinical Practice and Human Subject Protections training expiration dates of all listed study team members

The research team maintains responsibility for providing OHRS documentation of continuing review approval from the sIRB. If continuing review approval is not provided to OHRS before the approval lapses, the study will be placed on hold, and participants will not be able to continue the research at any DF/HCC site until the protocol is reactivated.

Progress Reports receive an expedited Scientific Progress review for Cancer Center Support Grant reporting purposes. The Progress Report may be subject to full SRC review should the expedited SRC reviewer determine that there is difficulty with accrual, concerns with the study's overall scientific progress, or concerns with the study's scientific validity.

## Study Completion

Once all research interventions at all DF/HCC participating sites are complete, the DF/HCC research team must submit a Study Completion Form in iRIS. Please include the following documents in the submission, as necessary:

- **External IRB Closure Memo**: include in the submission if the external IRB has completed research interventions at every participating site, include all DF/HCC sites.
- **Email Correspondence of Principal Investigator Acknowledging to Complete the Study**: required for all study completions ensuring that the DF/HCC PI is aware that all research interventions will cease for the ceded study.
- **ODQ Study Complete Correspondence**: required if OnCore is used as a registration center.
- **Sponsor Correspondence/Memo**: required if the sponsor has completed the study for any reason (e.g., futility, scientific validity, etc.).

Once the research team receives the Study Completion memo from OHRS, the research team cannot perform any additional research interventions or data analysis.