



The NCI CIRB Initiative: Change and Growth

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The CIRB Initiative in Context

- **What is the CIRB Initiative?**
 - **3 Boards (member bios at www.ncicirb.org)**
 - **Adult Late Phase Emphasis CIRB**
 - **Adult Early Phase Emphasis CIRB**
 - **Pediatric CIRB**
 - **Menu**
 - **National Clinical Trials Network (NCTN; formerly the Cooperative Groups) extramural treatment trials phase 3 and selected phase 2; ETCTN phase 1 and 2; COG phase 1, 2, 3 and pilot**
 - **Participants (users)**
 - **Institutions whose investigators conduct the above trials (estimated 2800 unique sites)**

Overview of the CIRB Model

- **Previous Model of Facilitated Review**
 - From 1999 – December 31, 2013 operated under a “shared responsibilities” model where IRB review responsibilities were shared by the CIRB and the Local IRB
 - Institutions chose to enroll

Facilitated Review



Overview of the CIRB Model

- **Independent Model**
 - As of January 1, 2014 the CIRB operates an “Independent Model”
 - CIRB is “IRB of Record”
 - Local IRB has no IRB review responsibilities
 - CIRB reviews institution’s local context considerations before the local PI can open the study
 - CIRB reviews locally occurring unanticipated problems or serious or continuing non-compliance
 - Institution is responsible for monitoring conduct of research
 - Including reporting concerns to CIRB
 - Institutions in NCTN required to enroll; can request waiver only if it can prove turn around time as fast as CIRB (process for requesting a waiver not yet established)

Why a model change for the CIRB?

- **Rationale for change to Independent Model**
 - AAHRPP encouraged
 - NCI anticipated model change would increase CIRB enrollment and utilization
- **Need for Pilot Study**
 - Impact on local institutions already using the CIRB
 - Feasibility and best practices for the CIRB Operations Office

Pilot Study of Independent Model

- **Pilot**
 - **22 sites**
 - **20 sites already using facilitated review; 2 sites volunteered who were not previously enrolled**
 - **12 month duration**
 - **189 (not unique) studies opened**
 - **NCI's Office of Market Research and Evaluation surveyed IRB and research staff**
 - **78% “very satisfied” or “extremely satisfied”**
 - **84% “extremely” or “very likely” to recommend to colleagues**

Independent Model



Institutions can enroll in CIRB at any time

Key Features of the CIRB Independent Model

- **Framework is the same as previously**
 - Institutions must complete enrollment process
 - CIRB review of protocol entails interaction with Study Chair/Group at national level
- **CIRB is the IRB of Record**
 - Local context considerations are under the purview of the CIRB
 - Annual Institution Worksheet
 - Annual Principal Investigator Worksheet
 - Study-Specific Worksheet
 - There is no relationship with the local IRB per se; the relationship is between the CIRB and the institution which remains responsible for the conduct of the research; there is no facilitated review

Key Features (cont'd)

- **Local context considerations include**
 - Does investigator have sufficient time to conduct and complete studies
 - Does investigator have an adequate number of qualified staff
 - Are facilities adequate to conduct studies
 - Confirming that boilerplate language for the informed consent document complies with federal regulations
 - Confirming that any unique institutional requirements are appropriately addressed
- **CIRB must review completed Worksheets describing local context considerations**
 - Local Context Reviewers on the CIRB fulfill all CIRB membership functions and present any local context consideration reviews to the convened CIRB, when necessary

Key Features (cont'd)

- **CIRB Review of the ICD**
 - CIRB reviews and approves the model informed consent document (ICD) as supplied by the Study Chair for initial review and amendments
 - Principal Investigators have the responsibility to insert into the CIRB-approved model ICD the CIRB-approved boilerplate language
- **Unanticipated problems and/or serious or continuing noncompliance reported directly to CIRB**
 - PI/Institution submits management plan, when applicable
 - CIRB makes determination and does reporting, when applicable

Division of Responsibilities under Independent Model

CIRB

- Initial Review
- Continuing Review
- Amendment Review
- Conducts reviews for local context concerns
- Reviews/determines Unanticipated Problems both locally-occurring and trial-wide impact

Signatory

- Ensures safe and appropriate performance of research at the site
- Maintains records for CIRB-approved studies per Network Group guidelines

Goals

- **2014/2015**
 - **Plan/conduct required enrollment of NCTN and ETCTN institutions**
 - **Obtain AAHRPP reaccreditation**
 - **Establish another Board for cancer prevention trials for 2015**

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