Selection of sIRB for NIH Funded Research & Communication Plan

Advarra, Inc, has been selected as the single IRB of record (sIRB) for this research. This document outlines Advarra IRB’s statement of compliance, a summary of qualifications, the communication plan between the local site, local IRB, lead site, and sIRB.

Statement of Compliance
Advarra is in compliance with the regulations of the United States Food and Drug Administration as described in 21 CFR Parts 50 and 56; and, as applicable, the United States Department of Health and Human Services regulations 45 CFR Part 46; the International Conference on Harmonization Good Clinical Practice Guidelines; the Environmental Protection Agency 40 CFR 26; Part C Division 5 of the Canadian Food and Drug Regulations; and the Tri-Council Policy Statement.

Advarra has maintained accreditation by the Association for the Accreditation of Human Research Protection Programs (AAHRPP) since 2008. Advarra’s IRB operates in compliance with all relevant federal and local regulations and is registered with FDA and OHRP. Advarra’s IRB Organization number is IORG0000635, and the IRB’s registration number is IRB00000971. Advarra’s Federalwide Assurance (FWA) number is FWA00023875 (Note: researchers must list their institution’s FWA number on official documentation and may not conduct research under Advarra’s FWA).

Statement of Qualifications
Advarra is being selected as the sIRB for the following reasons:

● Over 30 years of experience in coordinating communications for multi-site reviews and the necessary technology systems to assist with this communication.
● Sufficient resources to provide timely and thorough IRB reviews of this research.
● Extensive therapeutic experience to meet regulatory requirements for IRB review.
● No FDA findings over the last 5 FDA audits.

Communication Plan
Advarra understands the importance of partnering with institutions, the study team, and local IRBs and has developed the following communication plan:

● Assign a POC to all institutional sites related to the IRB review and approval.
● Advarra will coordinate with the submitting party to determine the lead contact or group of contacts on protocol-wide submissions and correspondence.
● Advarra will schedule a conference call with submitting party before initial study submission to develop or update institutional information for submitting party and additional/multi sites, if needed.
● The lead contact/group will be kept apprised of all protocol-wide review determinations, requests for additional information needed to secure IRB approval, and status updates, through the online technology system.
● When requested, Advarra will also coordinate the review of any unique local site informed consent needs with the local IRB. Communication will be facilitated through Advarra’s technology systems.
● Advarra will maintain an internal database with unique institutional information accessible to sIRB staff/board working on IRB submissions.
● All study-related documents will be provided to submitters through the sIRB online submission portal.
● Advarra will communicate to site of origin of any plans to report to federal entity if necessary.

Authorization/Reliance Agreements

● Prior to initiating the study, Advarra will ensure that an authorization agreement clarifying the roles and responsibilities of the sIRB and the submitting site is signed by both the submitting site and Advarra.
● Advarra will assist the submitting site in determining which additional sites will need a reliance agreement and will assist with negotiating reliance agreements with those sites.
• Advarra will maintain copies of authorization agreements and communication plans but each institution/site will also be expected to maintain such copies and plans.

Review of Research

• Local Institution Considerations – Advarra understands the importance of collecting institution-specific requirements and applying similar local considerations to the review of research. Such information will be recorded at the time of submission and referenced during IRB review. Should any additional information be needed, Advarra will contact the local site and/or local IRB for additional local context.

• Conflict of Interest (COI) – Advarra appreciates that each local site has a unique process for reviewing and managing COIs. Upon submission, Advarra will assess if there is a reported COI and the planned COI management plan. Advarra will seek additional information on the COI and management plan from the local site and/or the local IRB as needed.

• HIPAA – Advarra provides review of HIPAA Authorizations and Waiver of Authorization in compliance with the Privacy Rule. The local site will be responsible for submitting a request for Advarra to provide these additional services.

• Review of Local Site Qualifications – Each local site will be required to submit the Advarra site qualification forms documenting the local site’s ability to conduct the research both in terms of resources and expertise. Any additional information needed to secure approval will be documented and communicated to the local site using Advarra’s technology systems. Upon review of the local site, approval documents including approval letter and local site specific informed consent forms, when applicable, will be available for the local research team on Advarra’s technology systems. Approval documents will also be available to the local IRB officials and lead site upon request.

• Revisions to Research Protocols – All revisions to research, outside of revisions needed to eliminate immediate harm as outlined in the regulations, must be submitted to Advarra. Any additional information needed to secure approval will be documented and communicated to the submitting party using Advarra’s technology systems. All protocol-wide revisions will be coordinated with the lead submitting party. Site-specific revisions will be coordinated with the local submitting party. When requested, Advarra will also coordinate the review of any unique local site informed consent needs with the local IRB. Upon approval, an approval letter and revised informed consent form, when applicable, will be distributed for use in re-consenting human subjects using the Advarra technology systems. The lead site will be responsible for distributing the revised protocols to each local site.

• Unanticipated Problems and Unanticipated Adverse Device Effects – Schuman IRB requires local sites to report any unanticipated problems involving risks to participants or others in research (unanticipated problems) as well as any unanticipated adverse device effects (UADEs). Specific reporting criteria is available on the sIRB website. All reports must be made within 10 business days using Advarra’s technology systems. Any event that requires immediate action will be brought to the attention of the IRB Chair. All protocol-wide decisions will be coordinated with the lead submitting site. All other events will be coordinated with the submitting party. Events that meet the criteria of unanticipated problems or UADEs will be communicated to the submitting party and the lead site by Advarra. Advarra will ensure prompt reporting to the applicable Federal Agency.

• Data Safety Monitoring Reports – All monitoring reports that represent an unanticipated problem in research will be managed as such. All reports must be submitted to Advarra. The lead site will be responsible for distributing the reports to all participating local sites.

• Non-compliance/Deviations – Advarra IRB requires local sites to report those events that significantly impact the integrity of the study of subject safety. Specific reporting criteria is available on the sIRB website. All reports must be made within 10 business days using Advarra’s technology systems. Any event that requires immediate action will be brought to the attention of the IRB Chair. All protocol-wide decisions will be coordinated with the lead site. All other events will be coordinated with the submitting party. Events that meet the criteria of serious and/or continuing non-compliance will be communicated to the submitting party and the lead site by Advarra. Advarra will ensure prompt reporting to the applicable Federal Agency. The lead site will have access to all reported events of non-compliance across each local site.

• Subject Complaints – Advarra will provide subjects with contact information in the event of any subject concern, question, or complaint. All subject calls are managed in a confidential manner. Any event that requires further investigation will be coordinated with the respective local site. Any event that results in the determination of serious and/or continuing non-compliance or unanticipated problem in research will be managed as such. The local IRB and lead site will be informed of the subject complaint based on the nature of the complaint and the subject’s willingness
to disclose this information. The submitting and/or additional site will also report to the sIRB, any subject concern, question or complaint.

- **Continuing Review** – To ensure the approval of the research does not lapse, Advarra will provide courtesy email reminders at approximately 8 weeks, 6 weeks and 4 weeks prior to the expiration of the approval of research. Should the local site be nonresponsive, Advarra will use other forms of communication such as phone calls and emails to notify the local site of the approaching expiration. Advarra will also notify the lead site of the approaching expiration. The local IRB, lead site, and local site will be notified immediately of any lapses in IRB approval.