

Type of Policy:	<b><i>PROTECTION OF HUMAN RESEARCH PARTICIPANTS</i></b>	Category:	<b>Orlando Health Institutional Review Board (IRB)</b>
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Title:	<b><i>Use of a single IRB of record</i></b>	Policy #:	<b>0330-1023</b>
Page:	1 of 2	Replaces #:	
Issue Date:	1/19/18	Developed By:	Orlando Health Institutional Review Board (IRB)
Revision Dates:	1/19/21, 09/14/22	Approved By:	Philip Giordano, MD Institutional Official <b>SIGNATURE ON FILE</b>

**I. PURPOSE:** All domestic sites participating in cooperative research, supported and/or funded by the Department of Health and Human Services (HHS), are required to use a single Institutional Review Board (sIRB) to conduct the ethical review required for the protection of human subjects. This policy applies to applications for National Institutes of Health (NIH) funded multi-site research with due dates on or after January 25, 2018, and contract solicitations published on or after January 25, 2018, and, as of January 20, 2020, all other multi-site HHS-sponsored cooperative research subject to the revised Common Rule (45 CFR 46, Subpart A) where each site within the United States will conduct the same protocol involving non-exempt Human Subjects Research. This Orlando Health IRB Policy and Procedure sets forth the Orlando Health requirements for compliance with this policy and may also provide a guidance structure for other research utilizing a sIRB for a multi-site study.

**II. DEFINITIONS:**

- A. Cooperative research: Non-exempt Human Subjects Research that involve more than one institution and is supported and/or funded by the HHS.
- B. sIRB: Single Institutional Review Board, designated as the IRB of record for all sites in a multi-site study.
- C. Relied-upon IRB/Institution: The sIRB or site designated as the IRB of record.
- D. Relying IRB/Institution: Any of the sites in a multi-site study which relies on the sIRB to be the IRB of record.
- E. OH IRB: Orlando Health Institutional Review Board
- F. CORO: Corporate Office for Research Operations (Orlando Health)
- G. IRBNet: Electronic IRB submission system used at Orlando Health
- H. Relying Site Application Form – an application with information on how the study will be conducted at the relying site, including Principal Investigator (PI), team members, relying site consent process, data protection, etc.
- I. Smart IRB – a platform developed by the National Center for Advancing Translational Sciences (NCATS) to facilitate IRB authorization agreements (reliance agreements) among institutions engaged in cooperative research.
- J. Boilerplate language – required informed consent form language specific to a single participating institution.

**III. POLICY:**

- A. For studies utilizing an Orlando Health IRB as the sIRB in a multi-site study, the Orlando Health research team and all participating sites must comply with the multi-site procedures published separately by the CORO and/or the OH IRBs. These procedures will ensure that the local PI is adequately managing and overseeing all sites.
- B. For studies that require an Orlando Health research team to rely on another IRB as the sIRB in a multi-site study, the Orlando Health team and the sIRB must comply with the multi-site procedures published separately by the CORO and/or the OH IRBs. These procedures will ensure that Orlando Health’s participation in sIRB multi-site studies is consistent with local resources, and with local policies and procedures.

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- C. Exceptions to the Single IRB mandate and this IRB policy:
- a. Research for which any Federal department or agency supporting or conducting the research determines and documents that the use of a single IRB is not appropriate for the particular context; or
  - b. Cooperative research for which more than single IRB review is required by law (including tribal law passed by the official governing body of an American Indian or Alaska Native tribe); or
  - c. Cooperative research conducted or supported by HHS agencies other than the NIH, if an IRB approved the research before January 20, 2020; or
  - d. Cooperative research conducted or supported by NIH if either:
    - i. The NIH single IRB policy does not apply, and the research was initially approved by an IRB before January 20, 2020, or
    - ii. The NIH excepted the research from its single IRB policy before January 20, 2020.

**IV. PROCEDURES:**

Procedures for multi-site studies (when Orlando Health is the sIRB for the study or when Orlando Health relies on an external IRB as the sIRB) are published separately by the CORO and/or the Orlando Health IRBs.

**V. DOCUMENTATION:**

Orlando Health Procedures for Multi-Site Studies.

**VI. REFERENCES:**

- A. Code of Federal Regulations: 45 CFR 46.114
- B. Final NIH Policy on the Use of a Single Institutional Review Board for Multi-Site Research
- C. OHRP Guidance Documents
- D. "Guidance on Exceptions to the NIH Single IRB Policy" released October 11, 2017
- E. Resources for Smart IRB (web page - <https://smartirb.org/resources/>)

**VII. ATTACHMENTS:**

- A. None.