Angie: I just wanted to welcome everyone to our February VAERS Webinar. Thank you for taking the time out to participate today. We have a couple of announcements before we get started with the webinar content. First, for committee administrators that may have joined us, if you have not already done so, please verify the projects in your active project list that was sent to you and let us know once that notification process has been completed.  
  
Secondly, I would like to extend an invitation to our March webinar. Right now, our topic for the March webinar will be Tracking a Project Across Multiple Sub Committees and Closing a Project in Multiple Subcommittees. With that, I will turn it over to Mary now and we can get started on our content for today. Thank you.

Mary: Thank you Angie for inviting me to present today. And welcome everybody, again, thank you for taking the time to attend this webinar. Next slide please. So it’s my goal today to provide you with the tools, tips, and tidbits needed for a successful submission of your continuing review to the Central IRB. With that said, here’s your first set of tidbits. Remember the five C’s and I’ll expand upon each of them. Correct IRBNet number, current version date for required forms, content, complete and accurate, conflict of interest, contact information. Next slide please.  
  
Okay. The first of our five C’s, correct IRBNet number. Each site has a unique IRBNet number assigned to it. No two sites share the same number. Not even in the case when the principal investigator study chair, known as the PISC, site, also has an approved local site investigator LSI at the same location. Please be certain that the PISC has shared the project with each LSI using the multi-site share function and proper access is granted. For questions regarding the Central IRB project shell numbers, you may contact VA Central IRB at va.gov. I highly suggest you look into this and resolve any issues well in advance of the continuing review submission. Next slide please.  
  
The next of our five C’s, current version date for required form. The location of the required forms is within IRBNet. Go to the forms and template tab. Then, click on the down arrow in the library and select the VA Central IRB administration documents for researchers. Once you're in this library, there is a wealth of information. There are flow charts, guidance documents, instruction sheets, and of course all the current forms that are needed. Please use only these current versions of the forms. Next slide please.  
  
Okay the next of the five C’s, conflict of interest alternative documentation of review. That’s quite a mouthful. Let me unpack this just a bit. Office of general counsel requires annual review of the financial conflict of interest for investigators. The Central IRB needs only the documentation of the review. And the 115C form, alternative documentation of financial conflict of interest review is just that. It’s available as an alternative if your site doesn’t have an already established memo, form, or template for the review of the conflict-of-interest form. So, if there’s an established correspondence already in use, and it’s signed by the conflict-of-interest administrator, that is absolutely fine. The 115C is available if you have no other options. And let me add that for each site, only one 115C is required for all the investigators listed on the 115A or B form at that site. We’re trying to be as efficient as possible, so we need only one 115C form for all the investigators at that specific site. Next slide please.  
  
And the next of our five C’s, contact information. I know that IRBNet offers a wealth of names for you guys to choose from. And you have that 50/50 chance that you're going to select the right person for your specific question. Well, let me increase your odds. It’s me. Mary Eckart for all things continuing review. Please reach out to me well in advance of the continuing review submission. And I’m really addressing this to the national coordinators, the PISC study team coordinators, program managers. We can go over the process, go over forms, go over specific questions for your study. This will facilitate accurate information for you to disseminate to all the local sites.   
  
And let me point out this is the start of the CR process and our relationship it’s not a one and done. We start with the meeting, well I highly suggest we have a meeting or at least a quick chat. And then I’m with you throughout the process right through continuing review approval. We work as a team. Next slide please.  
  
And next of the five C’s, content. Needs to be complete and accurate. How do we accomplish that? By not committing some of these common errors that are coming up and they necessitate unlocking the package and returning it back to the study team. Next slide please.  
  
Okay, the required forms and documents. As I said, they are in the library, the VA Central IRB administration documents for researchers. For the PISC, principal investigator study chair, also known as the lead site, the required form 115A, continuing review application, that 115C, alternative documentation of financial conflict of interest review for continuing review if there is no other established form or memo for local policy. The PISC site needs to submit the abstract. And for the abstract, please address each heading as described in the 115A in section six. We’re not asking you to submit or create a mini protocol. Truly the abstract can be a page or two and it’s only required by the PISC study site. DSMB/DMC summary as applicable. And any audits not already reviewed by the Central IRB and publications when available. Next slide please.  
  
Required documents for the LSI, the local site investigator. 115B, continuing review application for LSI. There’s that 115C again. If there is no already established memo or correspondence documenting the review of the COI, please use the 115C. Audits not already reviewed by the Central IRB, adverse event/ protocol deviation summary if it’s not already reported in the 115B in section seven. It’s up to the study team. You can summarize and list your AEs and PDs right within the 115B or you may attach a separate document. Completely up to you. If you do attach a separate document, please note that under the application contents that there’s a separate document so we will go looking for that. And at the same time, if you do list adverse events and protocol deviations right in the 115B, please do not mark that a separate document is uploaded.  
  
Please report only those events not requiring immediate reporting and those events that have not already been reported to the Central IRB. Only include those events since the last continuing review or initial approval if this is the first continuing review. Next slide please.  
  
Okay. Here are those common errors we talked about in the beginning. These are what goes against the completeness and accuracy that, again, requires us to send the package back. These are errors common to both the 115A and 115B. Next slide please.

In Section one, those circled, item number two, IRB number. Please put only the number assigned to your site in this section. Please don’t cross reference the PISC site if you're a local one or anyone else’s. We want only one number and that is the IRBNet number assigned to your site. Item number three, VA Central IRB study number. That’s the number that the VA Central IRB assigned to your study. It’s a four-digit number separated buy a dash. For example, 10-02 or 20-24. That’s the number we’re looking for. It helps us make a quick reference.  
  
Item number four, for the principal investigator study chair, form 115A, and for the local site investigator form 115B we’re looking for the PISC or the LSI and those specifically designated in the role of CO- PISC or CO-LSI. We’re not looking for co-investigators or sub- investigators in this section. Specifically, those designated in the role of CO-PISC, in 115A continuing review application or those specifically designated in the role of CO- LSI in the 115B, LSI continuing review application. If you're not sure if there is an investigator designated in those roles, for the PISC site, please refer to the initial application form 108 and for the local site, please refer to your form 104 initial application or through amendments. For the PISC the amendment would be form 134. For the local site to add a CO-local site investigator it would be form 134B. And number five, please be certain to put the city that the facility is located in. Next slide please.  
  
Section two and this is the same in both the PISC continuing review application 115A and the LSI continuing review application 115B. Those columns that I have circled in red, Date of current human subject protection training. This training needs to remain current throughout the process right through continuing review approval. With that said, we understand that there are some staff that are going to have to take their training potentially several weeks early. Unfortunately, there’s just no way around that. Thankfully the training is good for three years.  
  
That next column, staff added via approved amendment by the IRB since the last continuing review or initial approval if this is your first continuing review. This means that an amendment was submitted and approved by the Central IRB to add staff. With that said, when this column is marked, we are going to look in section eight and cross check. In section eight there is a table for approved amendments and we’re going to look for that amendment that added staff. If you are looking to add non investigator staff with this continuing report, that next column is the appropriate column to mark.   
  
Investigators can never be added at continuing review. They always require a separate amendment. And again, we try to make it easy to add staff at continuing review so those staff in non-investigator roles and those that won't affect any study documents such as consent form or recruitment materials if they do not need to be revised, those staff can be added at continuing review simply by listing them here in section two and checking the box in the appropriate column.  
  
Finally that last column, confirm properly credentialed through the local R&D office. Central IRB we are strictly looking for confirmation that the staff has appropriately completed the requirements set out by their local R&D office to work on the particular research study. Next slide please.  
  
Okay, section three, current status of the study. This is the same in both the 115A PISC continuing review application and the 115B LSI continuing review application, although they are listed in different order. But the most common error is the selection of number one, Study was approved as a data collection and analysis only study at this site; there is not participant enrollment or interventions, to include interviews or surveys, and data analysis is ongoing. Please do not mark this box if you are in data analysis only because all interventions have concluded. That is never appropriate. This box is appropriate when the study was initially approved as a data use and collection only study with no participant involvement, enrollment, intervention.  
  
The other common errors when there is a status question, and it asks to provide a date such as Date closed to enrollment, date participant intervention ended, date follow-up ended. Please enter those dates as well as marking the box for the appropriate selection. We often must return this because there’s not a date provided. Next slide please.  
  
Okay. Section eight, documentation verification and ongoing local monitoring. While this one is in the PISC 115A continuing review application, the local site also has a very similar question as well. This first one, since the last continuing review application, have you submitted any amendments to the PISC application and received approval from the VA Central IRB? Please mark the little box either yes or no. And if it’s yes, please enter that amendment into the table with the date of Central IRB approval. And simply the main content of the amendment. We don’t need every aspect of that amendment. We can certainly look it up in IRBNet if there are any specific questions.  
  
At the same time please do not put any pending actions in the continuing review application. Please don’t put any pending amendments, only actions that have been approved should be in the continuing review application. Anything pending can be reported at next continuing review.   
  
So, for the local sites, the 115B application the question is very similar but asks for local site amendments. We’re not looking for updates that are associated with an approved PISC amendment. We’re looking specifically for an amendment that was submitted by the LSI and or study team and received approval. That would be submission of form 116 or 134B. So again, no updates for the LSIs. Only those local site amendments that received Central IRB approval.  
  
The next question, again this is similar in the local site continuing review application, has a regulatory audit also known as triennial audit been conducted at the local sites since the last continuing review, again please mark the box yes or no. And if it is yes, include the date the audit was conducted.

The next question, has this audit report already been submitted to, and reviewed by the Central IRB? If yes, please provide the package number that has the final Central IRB determination or the Central IRB correspondence regarding the review of the audit. If you don’t have Central IRB determination, or correspondence from the Central IRB, that audit wasn’t reviewed by the Central IRB and does require you to submit it with continuing review.  
  
At the same time, this is kind of a check and balance time. Look at that audit and be sure it does not have significant findings. If it does, please do not include it in the continuing review, rather submit it right away through the proper channels. Next slide please.  
  
Section nine. This is specific to the 115A principal investigator study chair continuing review application. Second column, please provide the location of the VA facility, the city. Put the city, not the facility name. For example, Charleston, Hines, San Diego, Cleveland. We want the name of the city and not the name of the facility. Also, list all local sites even if they have been closed even recently or a long time ago, please list them and in caps, in parenthesis, indicate closed next to them. Next slide please.  
  
Okay, application package. So, similar in both the PISC application and the local site. Although the PISC has a few extra boxes. Please, once again this is your time, check and balance to be certain that you have provided the required documents and that whatever you mark is in fact included in the continuing review package. If you mark that there is a consent audit or any kind of audit, we’re going to look for that audit in the documents and then we’re going to go back into the continuing review application in the appropriate section to see did they indicate one was conducted and we’re going to look for that and then we’re going to have to send this back to you and ask for it if it was marked and the audit was not included. And likewise if there is an audit and it is not marked. So please, this just all goes back to completeness and accuracy. The more accurate we are, the more efficient and less chances that we must send the submission back to you, open the package and have you edit as needed.  
  
Also, with that said, the goal is to, for minor revisions, open the package and have you edit the existing document. Most often it’s the 115A or the 115B that requires some revisions. When these revisions are minor, we ask that you just edit the existing form while maintaining the PISC signature or in the case of the local site continuing review application you maintain that local site investigator signature. Again, we want to keep things as efficient as we can. If there are major revisions required, we will indicate a new signature is required. Next slide please.  
  
Okay, these are common errors that are specific to the 115B, the LSI continuing review application. So, all the ones I just described and here’s a couple more. Next slide please.  
  
So, section four, participant enrollment. Right up by my, I guess you would call it a star, I’m not a very good artist. But that number one, total number of participants approved for this project per local site investigator application. So, either this question is skipped over, or the number provided is the overall enrollment number of the entire study. We are looking for the approved enrollment number for this particular site and again if you're not sure, please look back in your initial application, the local site initial application and you’ll see that number that you're approved for.  
  
Going down to the next highlighted section, note for first time continuing review application please complete only the since initial VA Central IRB approval column, my arrow pointing to that one. That’s the only column that requires a number. We don’t need a zero, triple zeroes, anything in that since last continuing review. We don’t need anything in that column. And this is for the first-time continuing review application. Next slide please.  
  
And again, we touched upon this, but it is worth mentioning again since the last continuing review have there been any adverse events or protocol deviation or violations occurring that did not require immediate reporting and have not already been reported to the Central IRB. Please mark the box yes or no. And this is where you can list them right here in the 115B summarize total and it can be right in here. Or again if you wish to attach a separate document, perfectly fine. But we are looking for those events since the last continuing review or since initial approval if this is your first continuing review. Please do not provide, report events already seen by the Central IRB or ones that also have been reported to the Central IRB separately or were contained in previous continuing review applications.  
  
And then also, again, regarding audits whether they’re regulatory or consent audits, we want to see only those audits conducted since the last continuing review approval or initial application approval. And those that have not already been submitted and reviewed by the Central IRB and those that do not have significant findings. They all can come in at the continuing review. Next slide please.  
  
And there’s that little section since the last continuing review has your local site submitted any local amendments, I did touch upon this when I was referring to the PISC amendments. Here it is in the local site investigator continuing review application. It’s right here again, no updates. Just those amendments specifically submitted by the local site. And no pending actions please. Next slide please.  
  
Okay. Here’s a wrap. Each site creates a continuing review package and uploads it to a unique IRBNet number. And there’s no specific order in which the packages need to be submitted. Just all due by the Central IRB established deadline as stated in the continuing review reminder notices sent out. And they are sent out 90 days before expiration, again at 60 days, and the continuing review submission is due into the Central IRB 60 days before expiration. Only those documents listed in the 115A and 115B are required if all the currently approved documents are already in IRBNet. And I am referring to the currently approved consent form. Currently approved protocol, consent waiver, HIPPA waiver, reviewed HIPPA authorization. Most likely these are already within IRBNet but something to check out ahead of submission time. You can reach out to me, reach out to the manager of your study. But if the documents exist in IRBNet already, they do not have to be copied and placed in your continuing review package. Again, the goal is to use everybody’s time wisely, efficiently, and try to cut out all those redundancies.   
  
Those packages that require revisions, they are unlocked so that the existing document can be edited as applicable. And once the study team has made those revisions, please mark the package as revisions completed. Lock it and this will send notification to the Central IRB. And I will go back and continue processing the continuing review package. So, when I’m talking about the common errors, those are all found in the administrative review that’s done on every package. We try to capture any of these common errors so that they are in the best shape when they are sent on for the Central IRB reviewer or for the convened board.   
  
It's the hope that once they get the continuing review it is in great shape and very little work needs to be done and hopefully they will be ready to approve. So that is it, that is my wrap up, and we’re happy to answer questions.

Angie: Thank you so much Mary. We’re going to switch over now and I am going to stop sharing the slide deck and Brandon is going to bring up any questions that have been submitted in the Q&A box. Alright let’s get started with our questions. How do we know which studies will require continuing review and which only need the annual report?

Mary: Good question and I get that often. So your initial approval letter will state whether continuing review is required. So, if that study adheres to the 2318 common rule and its minimal risk, it meets all the other criterial, your initial approval letter will state that continuing review is not required. Rather, annual status reports. And it will be pretty specific and provide you form number which form 130 is the annual status report. But it is in your initial approval letter that will let you know whether continuing review is required or the annual status report. Because there are some studies, while they are minimal risk and normally would not require continuing review, if the Central IRB reviewer or the Central IRB wants to see that study even if it’s for one cycle of continuing reviews or so on, it will be stated in the initial approval letter.

Angie: Thanks Mary.

Mary: You bet.

Angie: Is there a flow chart for continuing review in IRBNet?

Mary: Flow chart?

Angie: I think they were looking for maybe a process diagram that shows each of the steps that everyone takes in the entire CR process.

Mary: Got you. No, I don’t believe that there is a flow chart for the review process. We can certainly work on creating one. For now, I can walk you through the process. The package is submitted/uploaded to IRBNet and the CIRB Admin gatekeeper checks it and then sends it on to me or whoever is handling the continuing review, it is added to my admin agenda, and I conduct an administrative review. That’s where I identify any errors, any deficiencies, anything that needs revisions or additions. I open that package and contact the study team with a list of required revisions. The study team makes revisions and once those revisions are complete, I forward the submission on to either panel 1 or panel 2 for the reviewer, and/or for the convened board action. Once the board or the reviewer, in the case of expedited review, completes their review and approves, I create and publish a continuing review approval letter.

Angie: Will the old CIRB number ever be needed?

Mary: Yep. And that is when I pointed out in section one, asking for the VA Central IRB number that four-digit number we would like you to put it in section one of the 115A and the 115B. So we keep both the IRBNet number assigned as well as the VA Central IRB number.

Angie: Do you want only the project ID or also the package ID after the hyphen?

Mary: Only the project ID number is required. I often see it both ways and they certainly won't return a package because it has the package number but really, we’re just looking for that IRBNet project id number up in section one.

Angie: Where do we get the VA Central IRB study number?

Mary: I believe that that is, that’s a good question because I don’t assign them. We manually assign them. And by we, it is not me, it is at the gatekeeper time and I’m trying, I will have to get back to you to find out where that VA Central IRB assigned number first appears. So I will find that answer for you. I don’t want to misspeak.

Angie: Can you clarify if the local review of COI is required annually for all investigators? Our local office has not been receiving many and we have been told by study staff they weren't required unless changes were reported.

Mary: So it is the office of general that requires annual review of the COIs, and I don’t believe they have put out specific policy or process on how that’s accomplished. The Central IRB just needs documentation of that annual review.

Angie: For the PISC site, does the 115C include all the PISC investigators at all sites, just the PISC investigators at the PISC site, or all investigators at the PISC site regardless of whether they are designated as PISC investigators?

Mary: So, for all the investigators at the PISC site, if the COI administrator or designee has reviewed all the investigators listed in the PISC 115A, if that review has been completed by the COI administrator, then they are fine. One form, 115C is all that’s needed for the PISC. Again, if the COI administrator at the PISC site has conducted the review of the COI form. And I’d have to say, it’s pretty unusual that a COI administrator at the PISC site would look at and review COI forms for investigators not at that same location. Even though they are listed on the PISC 115A. It’s unusual, I’m not saying it doesn’t happen because that’s really up for local policy. But generally COI administrator or designee, the review happens at the local sites.

Angie: We can no longer put a note in assuring that the training will not last. If it is due to expire in the 60 days prior to study expiration.

Mary: That’s correct. Unfortunately, it has to remain current throughout the entire process up to continuing review approval.

Angie: We can no longer put a note in assuring that the training, that’s the same question.

Mary: Correct same question.

Angie: Will not allow updated certificates if completed more than 30 days prior to expiration. We are having the most trouble with this.

Mary: I really don’t know how to speak to that regarding the certificates. I haven’t heard that this is a problem. I will contact CITI to get guidance.

Angie: So for those questions that we can't answer today, we will distribute the questions and the answers via email. Just need a little time to research this issue. How do we update if staff leave the project?

Mary: In section two there are various sections within section two. Both in the 115A, PISC continuing review application and the 115B LSI continuing review application. There is a section to list staff that have left the study.

Angie: Staff members have an investigator that was not on ICF equipment material et cetera. And we’re going to add a continuing review but we’re told that we could not do this and had to do a PD and add them with an amendment that did not meet criterial listed in slide.

Mary: The 115A and the 115B say you can add non investigator staff with continuing review. Investigators have not been allowed to be added at continuing review for at least several years. They always require an amendment even if materials don’t need to be revised.

Angie: Do local non investigator stuff need to be approved locally before they are added at continuing review?

Mary: That you have to check with the local site. Generally, at the R&D office they have their established policy. It’s not for the Central IRB to determine that. I can say that Central IRB can approve staff added at continuing review even if local site hasn’t approved them. It really is a local site policy whether it happens, whether they are required to be approved locally first before the Central IRB, but the Central IRB can approve staff listed in the continuing review. Those non investigator staff.

Angie: Section two, should the dates be for the study as a whole or the specific site on the 115B?

Mary: Section two should the dates be for the study as a whole or the specific site on the 115B. Whoever asked this could you provide a little more clarification I’m sorry I’m not quite understanding. Section two lists the investigator name, the role on the study, whether they’re consenting or not, training dates. So I’m sorry I’m not sure what dates you're referring to.

Angie: What was the amendment number supposed to be? The number of the amendment within the study or the project package ID?

Mary: You can put the amendment number within the study. I know that there was some confusion initially as to how amendments are numbered. So if there is an amendment number, specifically, please put that. If there’s not, please put the package number that houses the final determination of that amendment.

Angie: These are good pointers, will they be pooled together in a cheat sheet of some sort that can be provided to study teams upon initial approval so the first CR is done right?

Mary: My slides, take them, save them, duplicate them. And certainly, reach out to me. I’m happy to meet with you, we can go over these same slides, I can focus on specific certain areas but use these slides and reach out to me. Because also I would like the first CR done right for everybody’s sake. Again, the best use of all of our time. I don’t want you out there wondering what do they mean by this? What should I provide? What answer? What do they mean? Absolutely reach out to me and we can discuss it together because there are questions, there’s specific scenarios you unique to a study. These forms they’re templates, they can’t possibly cover every scenario in every type of study. So, reach out and we can discuss things together and come to the right answer.

Angie: Can you clarify when a separate amendment is needed and when they can add a continuing review?

Mary: No investigator in any type of role can be added at continuing review. So investigator in any role, sub-investigator, co-investigator, co-PISC, co-LSI, no investigators can be added at continuing review. And, no amendments are accepted at continuing review, period. So, you can’t revise your consent form or recruitment material at continuing review. Amendments are always handled separate from the continuing review.

Angie: So I think this one goes back to the dates. The question regarding section two should be section three. I believe that was for 115B.

Mary: Okay I understand that. So, makes complete sense now. So, for the PISC 115A, section three, should be over the overall study. The status of the overall study. For the local sites, section three should be specific to their site because there are cases where some local sites are closed to enrollment. Other sites are still enrolling so, section three should be the status currently happening at your local site. Thank you for the clarification.

Angie: Are there any other trainings that CIRB checks as part of the continuing review process besides city and credentialing?

Mary: And, training, credentialing, privileging, that is all dictated at the local level through the research and development office, the Central IRB doesn’t dictate exactly the training. We are just confirming that the staff listed has completed the local requirements from the local R&D office.

Angie: If all is done appropriately, what is the timeframe for CIRB approval of a new project?

Mary: I’m talking about continuing reviews today, and not new projects and my focus is always continuing review. I handle all the continuing reviews for the Central IRB, so I don’t manage any one study. I don’t take an initial application through to initial approval so I’m unable to answer that question.

Angie: If a local R&D requests an abstract on their CR, how should this be handled locally?

Mary: I’m not 100% sure I’m understanding this correctly. The local R&D requests an abstract on a continuing review, how should this be handled locally? If the local R&D wants to see the abstract provided by the PISC site, if that’s the question, all local sites can see that abstract that the PISC has uploaded for the continuing review. So they can make that available to their local R&D site. If I didn’t answer correctly, please provide some clarification.

Angie: Should we be including the closed sites in the last section tally?

Mary: So, I believe this is the question in section nine listing all the local sites participating. That very last column asks for total number of participants enrolled or charts reviewed. So that total number would never change since the site is closed. So provide that total number, but certainly the column before that asking for enrollment or charts reviewed since the last continuing review. If the local site closed during the continuing review lookback period, you certainly would include those numbers. But if the local site has been closed for several years, only that last column there would be number.

Angie: And I think this will be our last question. If a site was part of the PISC initial application and has an IRBNet project number as part of the multi-site study, but never completed an LSI application, are they considered closed, need to be listed in the PISC CR form 115A?

Mary: So, any local site requires its own approval from the Central IRB. So even if it’s listed in the PISC application, it will require its own Central IRB approval and if it does, then it requires continuing review or at the same time it requires a 117B and that is to close that local site when it’s time. But if it did receive its own Central IRB approval for that specific local site, it does need to be listed on the PISC 115A form.

Angie: Okay I think that wraps up our questions. Thank you again Mary and I will turn it back over to our host.

Mary: Thank you.

Unidentified Male: I want to thank all our presenters and our audience members for joining in today. As a reminder to everyone, you should be able to access the slides and I just reposted that link and I’ll do it one more time for you all. You should be getting that message now. And as a final reminder, please do fill out that survey at the end of the webinar, we appreciate your feedback and will be using it to improve these going forward. So, thank you all and have a great afternoon.