How to Submit: Initial IRB Application

Step by Step Guide for Researchers and Support Staff

Please note: there are references to "the IRB website" throughout this guidance. The site we are referring to is always www.irb.upenn.edu

When we talk about "HSERA" we are referring to the electronic submission system for human research at Penn. It is important to know that these are 2 separate Internet locations. Use of both sites is required for successfully submitting to the IRB.

*This PDF is bookmarked for quick navigation

Covered here:

- Using the IRB Website (<u>www.irb.upenn.edu</u>)
- Using IRB Protocol and Consent Templates
- Using HSERA

USING THE IRB WEBSITE TO GUIDE YOUR SUBMISSION CREATION PROCESS

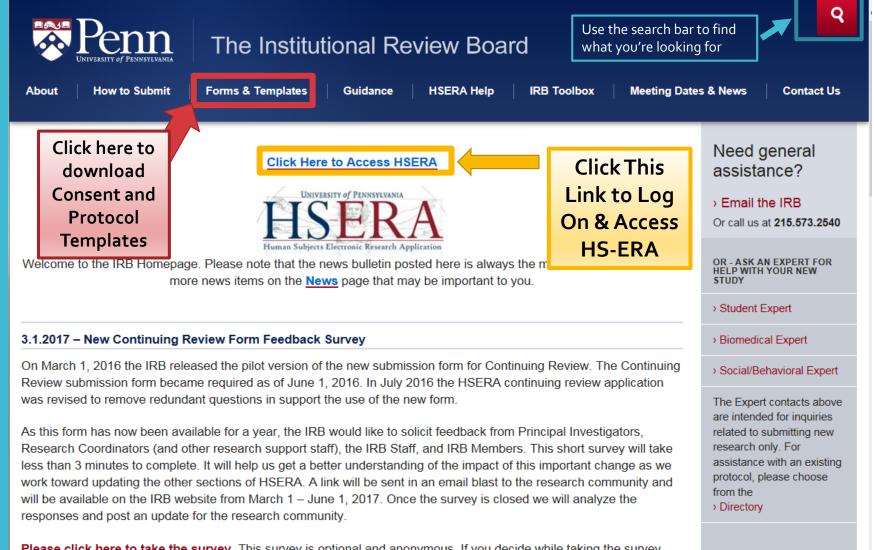
- Researchers and Research staff should reference the IRB website for instruction before logging on to HSERA to create submissions

- Go to www.irb.upenn.edu

- Use the guidance and templates provided by the IRB to build the documents for your project before you submit in HSERA

- A link to HSERA is provided on the home page for convenience

- If you work on multiple human research projects we suggest bookmarking and visiting the IRB website often to stay up to date on the latest news



Please click here to take the survey. This survey is optional and anonymous. If you decide while taking the survey

USING THE IRB WEBSITE TO GUIDE YOUR SUBMISSION CREATION PROCESS

- On the Forms & Templates page, filter for protocol documents

- Use the appropriate template for your type of project

- If you aren't sure if your project requires IRB review, download and complete the Human Subjects Research Determination Form and send to an IRB senior administrator via email for a consultation.

About How to Submit	Forms & Templates Guidance	HSERA Help IRB Toolbox Meeting Dates & News Contact Us				
Form Quick Finder						
Narrow your choices Update	Form Quick Finder	Description	Date			
Topic Agreements Consent Templates Protocol Documents Supplemental Forms Continuing Review Mods HIPAA Humanitarian Use	Title Human Subjects Research Determination Form					
	Protocol Supplement for Requests to Rely on an External IRB	This form is should be completed if you are asking the Penn IRB to rely on an External IRB through an IRB Authorization Agreement. It asks for specific details about the study that are necessary in order to ensure that the study adheres to the policies of Penn's Human Research Protections Program.				
	Protocol Template - Clinical Trial	This protocol template (developed by the Penn Office of Clinical research) is designed to help research teams develop a clinical trial protocol that includes an investigational intervention (drug, biologic, vaccine or device).	MAY 31, 2016			
Update	Protocol Template - Propsective Study Design with no Investigational Product (IP)	This protocol template (developed by the Penn Office of Clinical Research) is designed to facilitate the process of developing a clinical research protocol that does not involve an investigational product. E.g. Comparative effectiveness study, a cohort design, case control study, etc.	MAY 31. 2016			
	Protocol Template - Retrospective Study	This protocol template (developed by the Penn Office of Clinical Research) is designed to facilitate the creation of a retrospective clinical research protocol.				
	Protocol Template - Social Behavioral	This protocol template (developed by the Penn Office of Clinical Research) is designed to assist in the process of creating a social and behavioral sciences human research protocol	MAY 31, 2016			
	Quality Improvement Project Application	See the Guidance tab for more information about Quality Improvement projects.	AUG 26, 2016			
	Request for Waiver of HIPAA Authorization	Request for Waiver of HIPAA Authorization	FEB 27, 2014			

USING THE IRB WEBSITE TO GUIDE YOUR SUBMISSION CREATION PROCESS

- On the Forms & Templates page, filter for Consent Templates

- Download the templates that best apply to your study

- The templates have the basic required elements of consent which should be revised to describe your study.

- Additional language may be required depending on your study design (e.g. use of PHI will require HIPAA language, genetic testing will require GINA language etc...)

About How to Submit	Forms & Templates Guidance	HSERA Help IRB Toolbox Meeting Dates & News Contact Us		
Form Quick Finder				
Narrow your choices	Form Quick Finder			
Update	Title 🔺	Description	Date	
• Topic	Assent Form (Template)	Assent Form (Template)	OCT 07, 2012	
 Agreements Consent Templates Protocol Documents Supplemental Forms Continuing Review Mods HIPAA Humanitarian Use 	Conflict of Interest Disclosure Template Language	Conflict of Interest Disclosure Template Language		
	Consent Template for Risks of Social Media	This template should be used in development of Informed Consent forms for projects that involve the use of social media by subjects. Please note this is not the entire consent form -only the section related to social media risks.		
	Genetic Information Non-Discrimination Act (GINA) language	This language should be included in the risk section of your biomedical Informed Consent Form when genetic testing is being conducted AND the results of genetic tests will be entered into the subject's University of Pennsylvania Health Care System medical record. Please note, there may be other instances where this language might be required or recommended on a case by case basis as determined by the IRB.	MAY 31, 2016	
	HIPAA Language Template	This template should be used to develop protocol specific HIPAA language when creating an informed consent / HIPAA authorization form. This template version includes the new language to align with the roll out of the Clinical Trials Management System.	JAN 24, 2017	
	Informed Consent Form Template (Biomedical)	Informed Consent Form Template (Biomedical) -This template version includes the new EMR language to align with the roll out of the Clinical Trials Management System. The new language is required starting March 1, 2017	JAN 24, 2017	
	Informed Consent Form Template (Social and Behavioral Sciences Research)	Informed Consent Form Template (Social and Behavioral Sciences Research) - This template version includes the new EMR language to align with the roll out of the Clinical Trials Management System. The new language is required starting March 1,2017	JAN 24, 2017	

- Once your basic study documents are ready, log in to HSERA to create your application

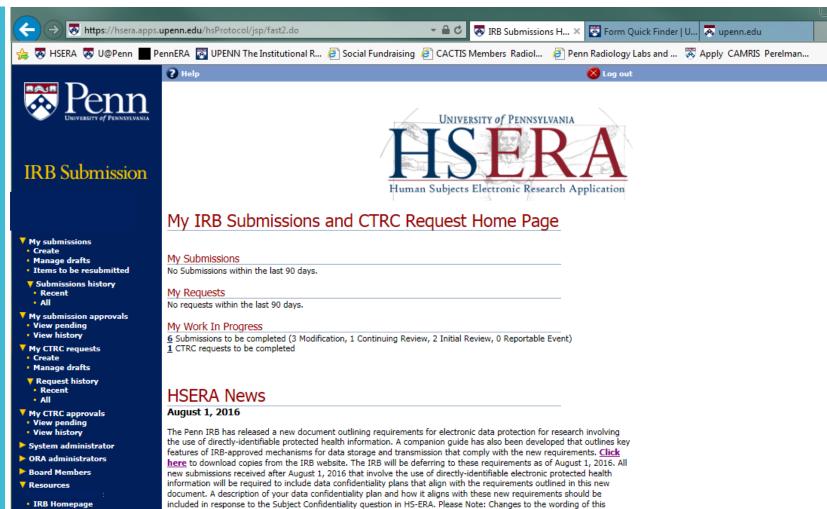
- The front page of HSERA has a menu of links along the left side for creating and managing your submissions

-The content in the center of the page shows:

"My Submissions" = your IRB submissions pending review

"My Requests" = your CTRC requests pending review

"My Work In Progress" = drafts you are working on for both IRB and CTRC



IRR Deadlines IRB Forms **ORA Important Links** Penn Online Directory CTRC Homepage

question in HSERA are in production to better align with the new guidelines, however the timeline for release has yet to be determined. Please note that after the August 1, 2016 release date, the IRB support staff will be reminding all research teams working on studies that involve the use of directly identifiable PHI to assess their current data protection plan to determine if modifications are needed. While a reminder note may be included in your continuing review approval letter, the IRB will not withhold or delay re-approval based on the current description of data protection plans.

- To create a new study Click "Create" under "My submissions"

-Review the information on this screen shot to get an idea of how to navigate with the HSERA menu

- Please note that the IRB staff and members are provided with navigation links in the HSERA menu that may not appear for typical users. In this training we are focusing on the universal navigation links that all users have access to although the additional links may still appear in the screenshots.

IRB Submission

- V My submissions
- 🔹 Create 🛛 🔺
- 🔹 Manage drafts 🤞
- Items to be resubmitted.
- Submissions history
 Recent
 All
- V My submission approvals
- View pending
- View history
- My CTRC requests
- My CTRC approvals
- System administrator
- ORA administrators
- Board Members
- V Resources
- IRB Homepage ____
- IRB Deadlines
- IRB Forms
- ORA Important Links
- Penn Online Directory
- CTRC Homepage

Click "Create" to make something new

Click "Manage Drafts" to keep working on something you already created but did not submit. A new submission will automatically appear in manage drafts after you complete the first page.

Click "Items to be resubmitted" to work on a submission that the IRB sent back to your team after performing a review.

Both links under "Submission History" will allow you to go back and view any submission for studies you are listed as personnel. Recent shows submissions from the last 90 days. This is a view only access.

"Submission Approvals" section is for Principal Investigators and Departmental Approvers only.

Use the resources links to : -go back to the IRB website -view the convened board meeting schedule -go to the forms page on the IRB website etc..



IRB Submission

My submissions

Manage drafts

My CTRC requests
 My CTRC approvals

System administrator

ORA administrators

IRB Homepage

IRB Deadlines

CTRC Homepage

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IRB Forms
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V Resources

Items to be resubmitted

Submissions history
 Recent

My submission approvals

Create

All

Help

Initial

<u>Review</u>

Review

Protocol Submission Type - Choose

- After clicking "Create" you will be brought to a new menu screen. Choose "Initial Review" to begin an application for submitting a brand new study

- The other application types are also available on this page.

- After a new study receives approval, any subsequent updates must be done by creating Modification submissions.

- You can renew your protocol annually by creating a Continuing Review.

Activities that Do Not Meet the Regulatory Definition of Human Research

The first question one should consider when assessing the requirement for IRB review is whether the activity meets the regulatory definition of human research. Anyone unsure about IRB review requirements and whether their proposed activity constitutes "human research" requiring IRB review should contact the Office of Regulatory Affairs. The IRB staff will determine if the activity is human research. If an activity does not meet the regulatory definition of human research, the IRB will, upon request, issue a letter stating that the project does not require IRB review or approval. Refer to the IRB Guidance: Is IRB Review Required?

Initial Review

Research must be reviewed by a convened meeting of the IRB unless the research is <u>exempt or is eligible for</u> <u>expedited review</u>. Final review category and submission requirements will be determined by the IRB.

Continuing Continuing Review for convened board or expedited review

The IRB Application for Continuing Review must be submitted no later than six weeks prior to the expiration date for full board review and no later than two weeks for expedited review.

🚫 Log out

Modification Modification of approved or existing protocol

Changes in approved research, during the period for which approval has already been given, may not be initiated without prior IRB review (or expedited review, where appropriate) and approval except where necessary to eliminate apparent immediate hazards to human subjects.

Deviation Deviations from the approved or existing protocol

An unintentional action or process that departs from the IRB approved study protocol and identified retrospectively, after the event occurred. If the impact on the protocol disrupts the study design or compromises the safety and welfare of the subjects, the deviation must be reported to the IRB within 10 business days.

Exception Exception Requests from the approved or existing protocol

A one time, intentional action or process that departs from the IRB approved study protocol, intended for one occurrence. If the action disrupts the study progress, such that the study design and results would be compromised, and the action compromises the safety and welfare of study subjects, prior documented IRB approval is required.

Reportable Event

able Reportable Event posing risks to subjects or others including adverse events

The IRB requires reporting of events that are: (1) unforeseen and (2) indicate that participants or others are at increased risk of harm. If yes to both, the problem is considered a Reportable Event involving risks to participants or others.

- After clicking "Initial Review" you will be brought to a new menu screen.

-You are given the option of opening a blank application or opening an application based on one of your existing studies

- You may only have one draft per protocol and will not be able to create a second draft for the same study.

- This guidance document is based on choosing "New Submission"

New Initial Review: Choose

New submission

Based on an existing protocol

This option will allow you to begin a new protocol for initial review starting from a blank submission form.

This option will allow you to begin a new protocol for initial review based on an existing protocol on which you are listed. You should choose this option only for new research, **NOT** for modifying or amending an existing protocol.



- After clicking "new submission" you are brought to the first screener page for the application

- Answering the screener questions will determine the level of specificity of your application.

- Step one is to establish if your project qualifies as "Exempt"

- Research that is exempt is minimal risk and falls into one of 6 specific categories. Once approved, Exempt research does not require any further IRB submissions throughout the life of the study.

- An Exempt application is the shortest application. If you submit an exempt application for non-exempt research you may be required to re-submit.



IRB Submission

Welcome WIRTANEN, EMILY A

- V My submissions
- Create Manage drafts
- Items to be resubmitted
- Submissions history Recent All
- My submission approvals
- My CTRC requests
- My CTRC approvals
- System administrator
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- Penn Online Directory

- CTRC Homepage

C Help	🚫 Log out
Human Subjects Questionnaire	These yellow icons appear
Question: Does your submission qualify for exemption from IRB review? Read the text for each category carefully. To qualify for an exemption in a specific category all gree bulleted items in that category must be true .	throughout the HSERA application.
For research involving FDA regulated products, choose Category 6. For research involving th use of cadavers, choose Category 4.	Click them to view
For full information on what research qualifies for exemption, refer to the following document: <u>Claim of Exemption Instructions</u> <i>Note</i> : The text for this question is quite long. You must scroll down to the bottom of the page to clic continue button.	helpful text.

- O NO This research project does not qualify for exemption from IRB review.
- O Category 1
 - Scroll down to review descriptions of all 6 Exemption
 - categories. You may choose ONE category that best The research
 - The research applies to your study. If your study is not exempt, - Research - Research
 - click the radial button for "No" and scroll to the classroom r The research
 - bottom to click "continue" The research



Help

Human Subjects Questionnaire

Question: Does your submission qualify for expedited review?

- If your study is not "Exempt", the next step is to determine if it is "Expedited"

- It is possible to submit an exempt application but the IRB may determine that your research qualifies as expedited.

- "Expedited" research is minimal risk and fits into one or more of 7 categories
- "Expedited" research requires annual continuing review to renew the application

- "Expedited" and "Exempt" research is not sent to the monthly convened board meetings for review. Instead it is screened by gualified IRB staff members and approved by one of the IRB directors

IRB Submission

Welcome WIRTANEN, EMILY A

My submissions

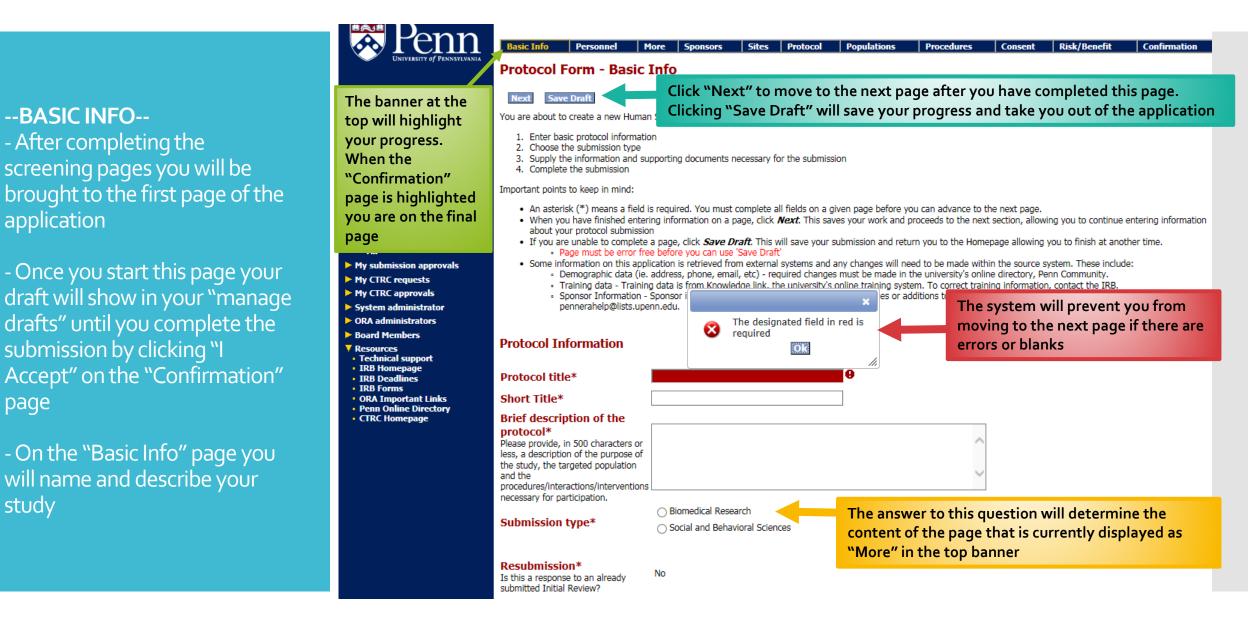
- Create
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An expedited review procedure consists of a review of research involving human subjects by the IRB chairperson or by one or more experienced reviewers designated by the chairperson from among members of the IRB in accordance with the requirements set forth in 45 CFR 46.110.

Applicability

- Research activities that (1) present no more than minimal risk to human subjects, and (2) involve only procedures listed in one or more of the categories listed below.
- The standard requirements for informed consent (or its waiver, alteration, or exception) apply regardless of the type of review.
- Categories one (1) through seven (7) pertain to both initial and continuing IRB review.
- Further information on expedited review can be found on the Office of Regulatory Affairs web site, see Expedited Review of Protocols Involving Human Subjects
- No This research study does not qualify for expedited review
- Category 1 C (a) or (b) is met. Scroll down to review descriptions of all 7 Expedited categories. You should choose all categories that
 - a. Research on o
 - apply to your study. If your study is not expedited, required. (Not acceptability
 - click the radial button for "No" and scroll to the b. Research on r Part 812) is n medical device bottom to click "continue"
- Category 2 Collection of blood samples by finger stick, heel stick, ear stick, or venipuncture as follows:

🚫 Log out



page

--PERSONNEL--

- After completing the Basic Info Page you will complete the personnel page

- The Principal Investigator (PI) must be an active Penn Faculty member who is available to review and sign off on every submission for the study

- Study contacts are study team members who can create and edit submissions to the IRB

- The "other investigator" slot is where students should name themselves on their projects since they cannot serve as PI

- It is important to keep the Personnel page up to date throughout the study

Zip

Basic Info Personnel I	Bio Sponsors Sites	Protocol Populations Procedures Consent Risk/
Protocol Form - Study F	Personnel	
Previous Next Save Draft Page must be error free before you can Principal Investigator* Char	aff	ick the green button to bring up the list of Penn filiates to choose from. You can choose 1 PI. The PI n create and edit submissions.
Name Department/School/Division Campus address, mail code Address	ZIOLEK, TRACY A 10250 - Institutional Review 3246 MELLON BLDG 133 SOUTH 36TH ST	
City State Zip Phone Fax Pager Email Human Research Training Complete and Current Training Expiration Date	PHILADELPHIA PA 19104-3246 215-746-6272 - ziolekt@pobox.upenn.edu Yes 01/03/2020	All study team members must have complete and current CITI training. If this area shows "NO" for any person on your study team, the IRB will not approve your study without supporting documentation of training
Name of course completed	CITI Protection of Human Subject	ts Research Training - ORA
Study Contacts Add Complete if different from PI - Up to T The contacts listed here will have view		u can choose up to 3 study contacts for a study. udy contacts can create and edit submissions.
Other Investigator set		u can choose 1 Other Investigator as a CO-PI. The
Name Department/School/Division Campus address, mail code Address City State		D-PI can create and edit submissions.

Personnel Page Continued:

- The Departmental Approver assigned to your Responsible ORG must approve your initial application before the IRB receives it. Be sure to contact that person to avoid delays

Responsible Org (Department/School/Division) Set The ORG chosen here Pick the University unit that is supporting this research if different from the PI's department Departmental Appr If your Org is not available for selection, please contact hsera_help@lists.upenn.edu ar Dust and a selected None selected Key Study Personnel Key Personnel are other members of PI or Study Contacts. There is no lime

Key personnel are defined as individuals who contrib in a substantive, measurable way. Do not list pers

Disclosure of Significant Financial Interests*

Investigators (persons responsible for the design, conduct or reporting of this research protocol) mu following financial interests / relationships with any entity that sponsors, provides support, or othen interest in the conduct or outcome of this research protocol (Outside Organization):

- Payments received for the past 12 months from a publicly traded Outside Organization for p consulting, lecturing / speaking, service on the Scientific Advisory Board) plus the value of a when aggregated exceeds \$5,000
- Payments received for the past 12 months from a non-publicly traded Outside Organization that in total exceed \$5,000, or having **any** equity interest
- Membership on the governing board of any Outside Organization, including service on its bo having a position of authority or responsibility to act in its best interests, including being an partner, or limited liability company member with management responsibility

Investigators must also disclose any financial interest in a drug, device or other product or a compe rights), regardless of whether the IP has been patented, licensed, or assigned to Penn, if such IP is evaluated, or developed in, or if its commercial value could be affected by, this protocol.

Investigators are **not** required to disclose equity in mutual funds and retirement accounts, as long not directly control the investment decisions made in these vehicles.

Does any Investigator (or his or her spouse or dependent children) have a SIGNIFICANT FINANCIAL above?

Yes

⊖ No

Certification

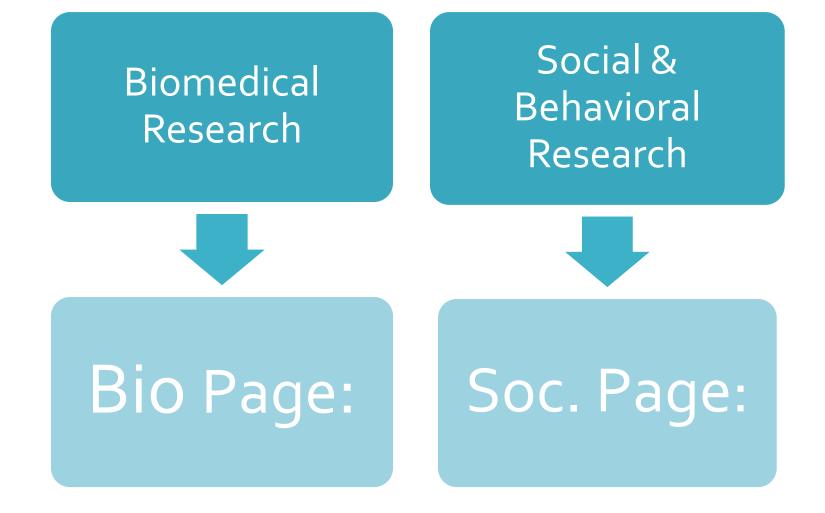
I have reviewed the University of Pennsylvania Policy on Conflict of Interest Related to Research, effective August 24, 2012, and to the best of my knowledge, all Investigators with a SIGNIFICANT FINANCIAL INTEREST have been identified above.

Previous Next Save Draft Page must be error free before you can use 'Save Draft' The ORG chosen here will determine who the Departmental Approver will be. Please consult your business administrator before choosing

Key Personnel are other members of the study team who are not PI or Study Contacts. There is no limit to the number of Key Personnel. Key personnel CANNOT create or edit submissions

> All researchers must disclose any financial conflicts of interest through the FIDES system. Any conflicts that are deemed as Significant must be identified here. Please contact the Research Integrity Office for more information

Click "Next" to move to the next page after you have completed this page. Clicking "Save Draft" will save your progress and take you out of the application --BIO/SOC PAGE--After completing the Personnel page, the next page depends on the answer provided in the first page of the application



--BIO/SOC PAGE Cont.--

The Bio/Soc page will identify any ancillary reviews that are needed for your study.

The Radial buttons chosen on this page will send pings to other Penn offices.

BIO Page

- Questions on the BIO page include but are not limited to:
- Drugs/Devices
- IND/IDE review
- Radiation Exposure
- Gene Transfer
- Human Source Material
- CACTIS and CT procedures
- CAMRIS and MRI procedures
- Cancer Related Research
- Medical information disclosure
- Path/lab Medicine services
- Apheresis/Transfusion
- UPHS Services

SOC Page

- Questions on the SOC page include but are not limited to:
- Description of survey instruments
- Description of study groups
- Methods for assigning subjects

--SPONSORS--

After completing the Bio or Soc page, you will complete a page about sponsorship and funding

All studies within the department of medicine must identify a business administrator

Protocol Bio Sponsors Populations Basic Info Personnel Sites Procedures Consent **Protocol Form - Sponsor** Previous Next Save Draft Page must be error free before you can use 'Save Draft' Business Administrator*** Set ***The Department of Medicine requires the inclusion of a Business Administrator (BA) for all regulatory submissions. Name Department/School/Division Phone Be sure to consult your business Fax administrator about your budget Pager Email code Department budget code If your research is funded/will be funded, please provide an appropriate 26-digit account number for IRB billing purposes. For current IRB fees and for which studies are billable, please see the IRB website: http://www.upenn.edu/IRB/mission-institutional-review-board-irb/irb-fees.



--SPONSORS CONT.--

In addition to Penn Budgeting information, the sponsor page requires specific information about funding for your study

Funding Sponsors Add

Identify the agency, organization, company or person providing funds for the research study. The IRB charges fees to cover the costs associated with the review of industry sponsored investigational drug and device trials.

Name	UNIVERSITY OF PENNSYLVANIA	Click the green "Add" button to
Туре	LIDENIAL Technical	choose from a list of sponsors. If
Remove		
		your sponsor is not listed, please

contact the HSERA help desk.

Funding sponsors billing address

If you have selected a commercial or industry sponsor, please provide the appropriate address and contact information for the Sponsor for the purposes of billing for IRB review fees (initial review, continuing review and convened modification fees apply here). If the Sponsor is not industry/commercial, this information is not necessary to provide with your application.

Funding sponsors gift

Is this research being funded by a philanthropic gift?

⊖ No

If the answer to this question is "yes", University Policy requires that the gift agreement signed by the donor includes a disclosure that iterates an individual gift may not fund a specific research protocol on which they or their family member wishes to participate. Please contact the Director of the IRB, Tracy Ziolek (ziolekt@upenn.edu or 215-746-6272) if you have any questions.

Please note: If the initial answer to this question is "no", but a gift is received during the conduct of this research study, the answer must be updated to "yes" upon receipt of the gift.

--SPONSORS CONT.--

For Biomedical studies using investigational drugs and devices, the Sponsor page captures the regulatory sponsor and IND holder information

Regulatory Sponsor Set

Also called the regulatory sponsor, this is the agency, organization, company or person primarily responsible for initiating and overseeing the research and ensuring the study complies with research standards and federal regulations. For clinical trials (studies involving drugs or devices) this is typically the FDA IND holder, for device studies, this is the FDA IDE holder.

- For industry-sponsored trials, typically the pharmaceutical/device/biotechnology company is the regulatory sponsor.
- For non-industry sponsored trials, the regulatory sponsor is typically the NIH or an NIH-designated entity (e.g. for the NCI, CTEP can be the regulatory sponsor if that entity holds the FDA IND or IDE).

For more information about regulatory sponsor status, INDs and IDEs, see the <u>Penn Manual for Clinical</u> <u>Research, section on Research Involving Drugs or Devices.</u>

Name

Туре

IND Sponsor Set

This option should be selected when the Principal Investigator, or another Penn faculty member, is the Sponsor of the IND or IDE being referenced for the research.

The Perelman School of Medicine requires that sponsors meet <u>certain qualifications</u> to serve as a regulatory sponsor (IND/IDE Holder). If the person being selected does not meet these qualifications, please contact the <u>OCR office</u> for guidance on how to proceed with the application.

Name	
Department/School/Division	-
Phone	
Fax	
Pager	
Email	

Industry Sponsor Set

Any additional funding sources not already addressed in the options above, or specific CRO information may be added here. ****This is the billing source** for **IRB-related fees for industry sponsored research.****

--SPONSORS CONT.--

The project funding question at the bottom of the sponsor page will expand and show additional questions based on your selection:

- If the study is funded by a grant that has a proposal linked to the PI, please select "yes" on the project funding question. Then link the proposal by clicking the "Set" button and upload the grant by clicking the "Upload Form" button. If your proposal is not available please contact the HSERA helpdesk.

- If the study is funded by a grant but the funding contract for the proposal has not yet been finalized through ORS (Office of Research Services), please select Pending for the Project Funding Question.

- If your study is being funded by an industry sponsor, please select "Yes" under the Project Funding question and select "Yes" under the Sponsor Funding question. Under Status of Contract, please select whether the contract has been completed or is pending. Sponsor Name Contact Name Street Address Street Address (continued) City, State/Province, Zip/Postal Code Phone Number Fax Number Email Address CRO Name CRO Contact Person CRO Street Address CRO Street Address (continued) CRO City, State/Province, Zip/Postal Code CRO Phone CRO Fax CRO Email Send bills for IRB to

Project Funding*

Is this project funded by or associated with a grant or contract? Yes No Pending

Previous Next Save Draft Page must be error free before you can use 'Save Draft' Clicking the green "Set" button will allow you to fill in the blanks in the section shown in the shaded box below. After you click "Save" you will be directed back to the Sponsor page and the information will appear.

--SITES--

After completing the sponsor page, the next page captures studies involving multiple sites

You may skip the questions on this page if :

your study only operates at one site
Penn researchers are not acting as the lead team or data coordinating team for the other sites involved
the Penn IRB is not serving as the IRB of record for the other sites involved

PLEASE NOTE:

The Penn IRB oversees all research conducted at Pennsylvania Hospital, Hospital of the University of Pennsylvania (HUP) and Presbyterian Hospital (PPMC). Studies conducted solely at one or more of these locations are considered a single site study for the purposes of IRB review.

Basic Info Personnel Bio Sponsors Sites

Protocol Form - Multi-Site Research



Page must be error free before you can use 'Save Draft'

Site Information

Management of Information for Multi-center Research where a Penn Investigator is the Lead Investiga information that may be relevant to the protection of human research participants, such as:

Protocol

- · Reporting unanticipated problems involving risks to participants or others.
- Reporting of interim results.
- Coordination of protocol modifications.

PLEASE NOTE: This information must be included if Penn is the lead/data coordinating site. There are no documents attached for this item.

Upload form

Other Sites



Management of Information for Multi-Center Research

Management of Information for Multi-center Research where a Penn Investigator is the Lead Investigator study, or Penn is the lead site in a multi-site study.

Provide a plan for the management of multi-site information that may be relevant to the protection of participants, such as:

- · Reporting unanticipated problems involving risks to participants or others.
- Reporting of interim results.
- Coordination of protocol modifications.

This section is applicable to studies that are Multi-Center Research and the Penn Investigator is the Lead Investigator or Penn is the lead site in the management of multisite information(Data Coordination).

If the above criteria apply please enter the other sites affiliated with this study by clicking the green "Add" button.

After you click the "Add" button you will be directed to a page where you can enter in site specific information. Click the save button once you have answered all relevant questions.

After you click save you will be directed back to the sites page. Please repeat the steps described above until information for all the study sites has been entered.

If this section applies to your study please answer the Management of Information for Multi-Center Research question by entering your response in the text box OR attaching a form with the green upload form button in the middle of the page. The rest of the HSERA application beyond the Sites page requires the details of your protocol objectives, design, background, population, procedures, etc.

The IRB highly recommends submission of a protocol document instead of relying on the HSERA to serve as your protocol.

If you are submitting an investigator initiated study and you have not been given a protocol by a sponsor or collaborator please see the IRB website for templates.

For researchers who already have a prepped Protocol document:

The sections that follow the Sites page can be completed by referencing the appropriate section of an attached protocol document. The IRB prefers this instead of typing out or copy/pasting sections of your protocol into the HSERA application. When making references to a protocol document in any section, please be sure to utilize the HSERA space to clearly identify any discrepancies between what the protocol document states and how the study will be conducted at Penn. For example– if the overall study includes a genetic sub study but subjects at Penn will not participate in the sub-study be sure to clearly explain that in the HSERA text field to prevent the IRB from raising unnecessary issues.

--PROTOCOL--

After completing the Sites page, the Protocol page is where specific information about the study objectives, design, duration and resources is required

The first 7 free text sections on this page should be completed with detailed protocol specific information ONLY if you are not submitting a protocol document. (Only the first 3 sections are shown in this walkthrough.)

the last section on this page about necessary resources should always be fully completed with information specific to the study at Penn regardless of the presence of a protocol document

Basic Info Personnel Sponsors Sites Populations Procedures Protoco Protocol Form - Details of Protocol If you have a protocol document to submit please only Page must be error free before you can use 'Save Draft' reference the section of that document where the abstract Abstract^{*} info can be found (do not copy/paste). If you do not have a Brief abstract (250 words or less) describing the study in language underst description of the purpose, target disease/condition if applicable, key eligib protocol document please consider making one using one of our available templates or fully describe your abstract here. If you have a protocol document to submit please only Objectives reference the section of that document where the **Overall objectives*** Objectives info can be found (do not copy/paste). If you do Brief statement of the overall objectives of the study not have a protocol document please consider making one using one of our available templates or fully describe your objectives here. Primary outcome variable(s) Define the primary outcome variable(s) used to support the study objective If you have a protocol document to submit please only treatment A is superior to treatment B in the treatment of subjects with variable is blood pressure measurement reference the section of that document where the primary outcomes info can be found (do not copy/paste). If you do not have a protocol document please consider making one using one of our available templates or fully describe your primary outcomes here.

--POPULATIONS --

The next page of the application is related to your targeted populations.

The Populations page has been divided into 4 slides to capture all of the questions

Part 1: Target population and sample size

Protocol Form - Characteristics of the Study Population

Previous Next Save Draft Page must be error free before you can use

Target population*

State the clinical condition, disease state, or diagnosis of Type II diabetes for greater than **Note:** Within the limitations imposed by the sufficient enrollment of persons of diverse etl research are equitably distributed.

Subjects enrolled by Penn Researchers*

The number of subjects to be recruited at Penn, zero if

If you have a protocol document to submit please only reference the section of that document where the population info can be found (do not copy/paste). If you do not have a protocol document please consider making one using one of our available templates or fully describe your population here.

This number should show how many subjects need to complete the study from beginning to end in order to answer the research question that will be enrolled by Penn affiliated researchers. If your enrollment goals are complex and cannot be defined by one number, please insert zero and fully explain your sample size and enrollment in the "Accrual" section below.

Subjects enrolled by Collaborating Researchers*

The number of subjects to be recruited at sites other than Penn. Er **Note** A multi-center study is a study where different PI's at different 1

This number should show how many subjects need to complete the study from beginning to end in order to answer the research question that will be enrolled by Non-Penn researchers. If this is not a multi site study then this should be Zero

Accrual*

Explain how you will have access to a population that will allow you to recruit the required number of subjects. Describe the statistical methods or theoretical justification for determining sample size or sampling approach for the study.

The accrual section should describe how your study team will access the targeted population and justify your sample size. Additionally, if you anticipate that a significant number of consented subjects will not qualify for participation or that subject retention may be an issue, please explain that here. For example "Although our sample size is 40 subjects we will likely have to consent and screen 150 – 200 subjects in order to reach this goal due to the strict eligibility and screening requirements."

--POPULATIONS --

Part 2: Inclusion and Exclusion + vulnerable populations by regulatory definitions

Key inclusion criteria*
List key inclusion criteria including age ran
1If you have a protocol document to submit please only reference
the section of that document where the inclusion criteria info can
be found (do not copy/paste). If you do not have a protocol
document please consider making one using one of our available
templates or fully describe your inclusion criteria here.

Key exclusion criteria*

List key exclusion criteria. If subjects are e justification for exclusion.

If you have a protocol document to submit please only reference the section of that document where the exclusion criteria info can be found (do not copy/paste). If you do not have a protocol document please consider making one using one of our available templates or fully describe your exclusion criteria here.

Vulnerable Populations*

Specify if the study intentionally includes any of the following populations: **Note**: Include the appropriate supplemental form for each vulnerable population included in the study. **Note**: Subjects who become imprisoned or are court-ordered to attend residential alcohol or other drug treatment facilities will be considered prisoners under Subpart C of the federal regulations 45CFR46. Such subjects cannot be continued in the research unless an amendment to the protocol is submitted and approved by the IRB and certification to the federal Office of Human Research Protections if the research is supported by the Department of Health and Human services.

Children Form

Pregnant women (if the study procedures may affect the condition of the pregnant woman or fetus) Form

Fetuses and/or Neonates Form

Prisoners Form

Other

✓ None of the above populations are included

There are no documents attached for this item.

Upload form

Certain populations are designated as "vulnerable" by the human research protections regulations. If your study involves the participation of these populations, your study will require additional IRB consideration. Please identify them by checking the appropriate boxes and attach a completed copy of the related supplemental form that is required for each population.

-- POPULATIONS --

Part 3: Other Vulnerable Populations and Recruitment

Populations vulnerable to undue influence or coercion*

When some or all of the participants were likely to be vulnerable to coercion or undue influence or influence such as mentally disabled persons, or economically disadvantaged persons, employees or students of Penn describe the additional safeguards have been included in the study to protect the rights and welfare of these subjects from coercion or undue influence.

Note: This section is intended to elicit information regarding additional protections when specific populations are included in a research study. It is not intended to trigger an exclusion of these populations.

Please read these instructions carefully before responding. This question is required for approval and your answer may dictate additional language for your consent process. Please be sure to note that any Penn affiliates will be told that their decision will not affect their standing with the University. Also, you don't need to reiterate any groups from the vulnerable populations section.

Subject recruitment* 🚺

Overview the approach to subject identification and recruitment, including referrals from physician offices, clinics ...

All recruitment materials must be IRB approved prior to use. If your protocol document fully outlines the recruitment methods that will be utilized at Penn, please only insert a reference to that section of the protocol. Otherwise please fully outline the plan here including : Flyers, television or radio ads, posters, physician referral, patient referral etc..

Use the following button to upload sample *recruitment materials* (i.e. radio/video scripts, flyers, internet postings, etc.) For guidance regarding recruitment materials, please see the following link: http://www.upenn.edu/regulatoryaffairs/Documents/irbgui-4.pdf

There are no docum

Upload form

Click the "upload form" button to attach your flyers, posters, scripts, and other recruitment materials.

-- POPULATIONS --Part 4: Internet recruitment and subject compensation Will the recruitment plan propose to use any Penn media services (communications, marketing, etc.) for outreach via social media avenues (examples include: Facebook, Twitter, blogging, texting, etc.) or does the study team plan to directly use social media to recruit for the research?*



Please indicate whether social media or the internet will be used to recruit subjects. Guidance about use of social media in research is available on the IRB website.

Please identify which method(s) of social media you will utilize, the content of the text to be used, and the method(s) for posting this information (i.e., using Penn supported communication services). When proposing the text to utilize, please be aware of any social media limitations (i.e., number of characters allowed in a tweet) and any appropriate confidentiality practices necessary to be compliant with posting research recruitment text.*

If the plan for online recruitment is fully outlined in your protocol document please only include a reference to the applicable section. Otherwise, please detail your plan for the online recruitment strategies including; the names of sites, the plan for publishing and managing online content, confidentiality etc.

Subject compensation*

Will subjects be financially compensated for their participation?



Please indicate whether subjects will be compensated in any way for participation.

Summarize any financial compensation that will be offered to subjects, e.g. cash payments, gift card, reimbursement for travel. The amount of compensation may not constitute an undue inducement to participate in the research. A prorated system of financial compensation is required in most circumstances. Provide the schedule for compensation per study visit or session and total amount for entire participation.

¹ If the plan for compensation is fully outlined in your protocol document please only include a reference to the applicable section here. Otherwise please fully detail the compensation plan including; total amount a subject may receive, amounts received per study interaction, form of compensation. Compensation must also be fully outlined during the consent process.



-- PROCEDURES--

After completing the Populations page, on the next page you will detail the procedures, statistical analysis, and data security methods for your study.

The procedures page is the longest part of the application therefore screenshots have not been included

Sections included on the Procedures Page

- Suicidal Ideation / Use of a test article that may effect the Central Nervous System
- Full description of procedures
- Use of deception
- Analysis Plan
- Confidentiality
- Sensitive Research Information
- Subject Privacy
- Data Disclosure
- Protected Health Information
- Waiver requests
- Tissue/Specimens information
- Genetic Testing

Tips for completion

- As you complete the questions on this page, additional questions may populate depending on your response to the trigger questions.
- Any section on this page that is a free text box can be completed with a reference to the appropriate section of your protocol document. If you do not have a protocol document please fully explain each response in the space provided
- When making references to your attached protocol, please be sure to clarify any information in the protocol that may be different for the Penn site (for example if subjects at Penn will not have a particular MRI scan, or sub study blood draw please clearly state that in the HSERA text box)
- Any checkboxes or radial buttons must be completed accurately regardless of whether the information is included in an attached protocol

Regarding Privacy, Confidentiality and Data Protection:

The procedures page requires information about ensuring subject privacy, protecting confidentiality and protecting identifiable data

Privacy VS. Confidentiality

- Your Privacy plan should outline how you will make each face to face,telephone, or online interaction with subjects as private as possible
- Your Confidentiality plan should outline how you will keep subject information confidential after it has been documented or recorded. This relates to storage and sharing of PHI.

PHI and Data Protection

- PHI is Protected Health Information. Most PHI and study data is recorded electronically. Implementation of a University vetted plan to protect electronic research data (storage, and sharing) became required in August 2016.
- There are 2 documents available on the IRB website to assist investigators in developing an appropriate electronic PHI / Data protection plan in collaboration with local IT support providers.

--CONSENT--

After completing sections about procedures, you must described the consent process. If this information is fully detailed in your protocol please only include references to the applicable sections.

When making references to the protocol document please be sure to clarify any differences for how consent will be obtained at the Penn site.

For example if the protocol includes an assent and parental permission section but Children will not be on the study at Penn, the children and adolescent section should state "Children will not be enrolled at Penn"

Basic Info Personnel Bio Sponsors Sites Protocol Populations Procedur

Protocol Form - Consent

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1. Consent Process

Overview*

Summarize how informed consent will be obtained, including how, when, where, and by whom it will be obtained. Describe any waiting period between informing the prospective participant and obtaining the consent. Describe any steps taken to minimize the possibility of coercion or undue influence. Describe the language used by those obtaining consent. Describe the language understood by the prospective participant or the legally authorized representative.

Please indicate who will provide consent or permission if the subject is incapable. Additionally, please describe the information to be communicated to the prospective participant or the legally authorized representative.

Informed consent is an ongoing process that takes place between the investigator/study staff and study participants. In most cases, this process is initiated with written informed consent at the start of the study; however, it also takes place as an ongoing dialogue between the investigator/study staff and subjects during the entire duration of their participation.

Children and Adolescents*

If children or adolescents are enrolled, describe the consent process including parental permission and subject assent. Please note: Except for research involving no greater than minimal risk, if a court appointed guardian provides consent, documentation of the court order or legal authorization to consent to general medical care must be copied and included in the investigator's research records with the documentation of permission.

Adult Subjects Not Competent to Give Consent*

Will all adult subjects be competent to give informed consent? If not, respond to the following:

- What is the likely degree of impairment? How will competency be assessed (eg, informal assessment by the investigator, mini-mental status exam, formal psychiatric evaluation)?
- Note: The methods of assessment of competence should be based on the population to be studied and the likelihood of cognitive or decisional impairment in that population.
- Will consent be obtained from a legally authorized representative, from whom will consent be obtained? Refer to the IRB Policy 705, Surrogate Consent/Authorization for guidance.
- Will subject assent be obtained? If no, provide justification.
 Note: Respect for persons requires that assent (or at least lack of active dissent) be obtained in most cases.

This section should detail any specialized consent procedures or resources in place for subjects who may participate but are unable to complete a traditional consent process noted in the overview section. Such as:

- Blindness or other visual impairment
- Deafness or other hearing impairment
- Short term or permanent cognitive impairment
- Short term or permanent physical limitations

Please note that predicting all possible scenarios is not required. If necessity for a specialized consent process is identified in the future, the IRB may approve the plan via submission of an exception request

--CONSENT--

The final question on the Consent page is related to waivers of consent.

If you indicate on this page that you are requesting any type of waiver, additional required questions will populate.

If you are not requesting a waiver of consent, please select "No Waiver Requested"

Waiver or alteration of required elements of consent

- Requesting this type of waiver means you do not intend to ask subjects to be part of your protocol.
- Typically this is related to retrospective review of existing medical records or publicly available data
- If you plan to waive consent altogether, you may also need to include a request for waiver of HIPAA authorization for use of health information if applicable. The HIPAA waiver request form is available on the IRB website

Waiver of documentation of consent

- Requesting this type of waiver means you WILL ask subjects to be part of your study but they will not physically sign their name to a document
- Typically this is related to online surveys where subjects click "I agree to participate" OR for telephone surveys where verbal consent is obtained.
- Occasionally subjects would only be identified by their signature on a form which may increase risk to the subject

--Risk/Benefit --

After describing the consent process, the application requires an assessment of risk to subjects and potential benefits of participation.

If your protocol document fully discusses the topics on this page please make references to the applicable sections (do not copy/paste)

This page also requires description of the Data and Safety monitoring plan. This plan will be referenced during annual continuing review (if applicable) to ensure adherence to the plan throughout the life of the study.

Basic Info	Personnel	Bio	Sponsors	Sites	Protocol	Populations	Procedures	Consent	Risk/Benefit
Protocol Fo	rm - Dick /	Rone	ofit						

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Potential Study Risks*

1

Describe and assess any potential risks associated with the research interventions (physical, psychological, social, economic, monetary, legal or other, loss of confidentiality) and assess the likelihood and seriousness of such risks. If methods of research create potential risks, describe other methods, if any, that were considered and why they will not be used.

Potential Study Benefits*

Assess the potential benefits to be gained by the individual subject, as well as benefits that may accrue to society in general as a result of the planned work (such as advancement of knowledge). Summary should also state if there are no direct benefits to subjects as a result of their participation in the study.

Alternatives to Participation (optional) Describe the alternatives available to the subject outside the research context.

The alternatives section is optional when the only alternative to participation is not participating. Otherwise, a full description of existing standard options must be included

col Populations Procedures

Protocol Form - Submitter's assurance

Documents attached within the application This section will show you any documents that you attached on previous pages

Additional forms or documents

Check all that apply

Cover Letter (with additional information that may help in the review)

There are no documents attached for this item.

Upload form

Full sponsor's protocol Please note: If you do not have a full/clinical protocol for upload, and are developed templates for common types of human subjects' research subr There are no documents attached for this item.

Upload form

To add more documents please check the box next to the type of document

you would like to attach and use the green "upload form" button to attach your files. Please be mindful to attach each document under the most appropriate header to assist the IRB in identifying your documents. You can attach as many documents as you need. Please note that your cover letter should include a list of all documents being submitted for review

Grant Application (minus the appendices & budget information, for federally-funded studies, e.g. NIH, CDC, DOD)

Performance site approvals for sites other than Penn (this does not apply to other participating sites which have their own IRB.)

- Informed consent form (and parental permission/assent form for research involving children)
- HIPAA Authorization or Waiver (if applicable)
- Investigator's brochure/product labeling (for research involving investigational drugs or devices)

Supporting documents

Check all that apply

Supplemental form(s) for research involving pregnant women, fetuses, neonates, prisoners, or children

Questionnaires, inventories surveys, diaries, personality tests, quality of life assessment or other surveys or inventories, data collection forms to be completed by subjects, interview & focus group scripts, consent and recruitment scripts.

Exception: Widely recognized, accepted, standard tests in a given field do not need to be submitted for review

All recruitment materials, including advertisements, brochures, letters to patients, transcripts of all broadcast materials, etc, if available. Otherwise submit when available for expedited review.

☐ If you have additional forms or documents to attach to this protocol, p	When you are done filling out the application and have attached all your
	documents you must click the "I accept" button to send in your submission.

I have read and understood the University of Pennsylvania guidelings concerning human subjects projects and protocols.

I certify that the information provided in this submassion is complete and correct to the best of my knowledge.



--CONFIRMATION – The confirmation page is the final page of the application where you will attach any

necessary documents that you have not already attached.

-Note: All initial submissions should always provide a cover letter that includes a complete list of documents you are submitting for approval (document name, version, date)

What happens after you click "I Accept"..?

Request Has Been Submitted

Thank you for submitting to the Institutional Review Board (IRB). A confirmation of your submission has been sent to you at your email address on file. Confirmation#*bcieib*

PrincipaI Investigator: STANKO, PATRICK A Title: my training protocol

Next

Immediately after clicking "I Accept" you will be shown a screen that provides a confirmation code. You should save the confirmation codes for every submission you create in the system

- The IRB will rely on this code to find your submission in the system. Please include it in all email correspondence or have it ready before you call on the telephone
- You will need the code to locate your decision letter in the system once it is uploaded by the IRB staff. The code associated with each submission is included in the IRB determination letter for that submission
- If you ever need to refer back to your original application in the future, you will need the code to locate it in your "Submission History"

What happens after you click "I Accept"..?

Clicking "I Accept" on an initial submission does not mean the IRB can begin its review.

 If the submitter of the initial application is not the PI, the submission then requires PI approval. The PI will receive an automated email alerting them of the pending submission. The PI can access the application by clicking "View Pending" under "My Submission Approvals" on the blue left side menu in HSERA



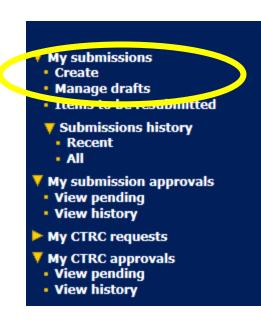
 Once the submission is identified and chosen in the "view pending" list, the PI must click "submit a decision for this protocol form" nrovals Submit a decision for this Protocol Form View Protocol Application i Revision History: Pending approval by LIEBERMAN, A Rejected by LIEBERMAN, ADIN Department Review History Date Reviewer Dept Approva 12/24/2009 LIEBERMAN, ADINA E Approved

and on the last page of the application, choose to either approve or reject it

Comments THIS IS WHERE THE PI DECIDES TO APPROVE OR REJECT SUBMISSION

What happens after the PI approves it?

 If the PI identified any issues with the application and decides to reject it, the submission will be available to the study team in the "manage drafts". Searching on this page by confirmation code is the fastest way to find the submission.

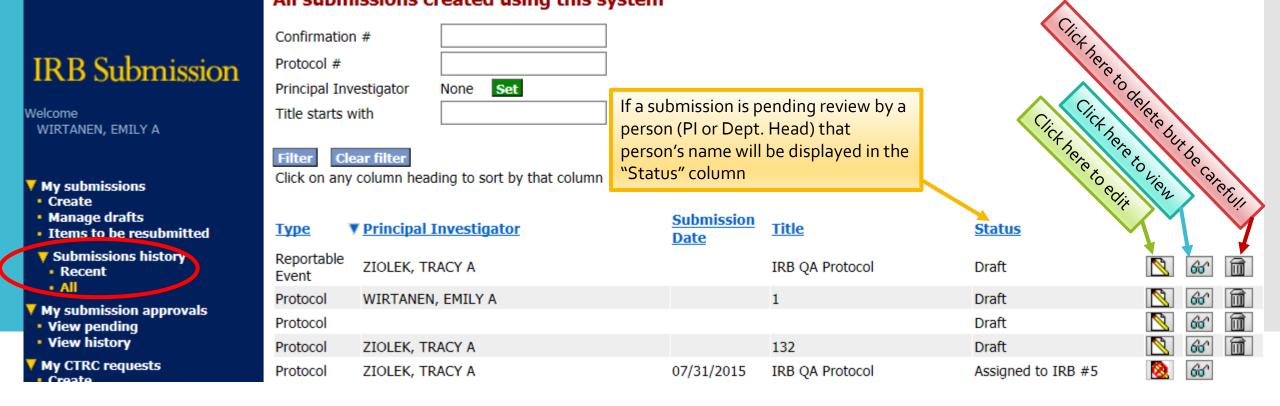


- Once the PI approves the submission it then requires approval by the department head. The department head who is charged with approving the submission is determined by the "ORG code" that was chosen on the Personnel page
- The department head follows the same steps as the PI to approve the submission and may also reject the submission for any reason
- After the department head approves the submission, the IRB receives it in the system to begin its review.
- Departmental approval is only required for submission of the first draft of an Initial submission. All future submissions require only PI approval

Members of the study team can check the status of any submission by looking in "Submission History" and sorting by the available search fields

All Submissions

All submissions created using this system



Summary of submission process

If you have begun the process and have questions that cannot be answered by this walkthrough, please send a detailed email to an IRB staff member.

Various contacts are available on the IRB website

Step 1:Submission is drafted.

- Step 2: PI reviews and approves the study. (submission may be returned for revision)
- Step 3: Department Chair reviews and approves the study. (submission may be returned for revision)
- Step 4: IRB pre-screen for initial review. (submission may be returned for revision)
- Step 5: IRB Review is scheduled. Protocol number and IRB Board number assigned.
- Step 6: IRB Review. Submissions requiring full board review will likely be returned for revisions prior to receiving full approval.
- Step 7: Resubmission of protocol to meet IRB stipulations.
- Step 8: Final IRB Review and approval.