

MEMORANDUM

TO: Adult CIRB Participants

FROM: Bianca Collins, Director of Operations, NCI CIRB

RE: **Two Important Changes: CIRB Changes to Initial Review Process and CIRB's own version of the Informed Consent Document**

DATE: April 30, 2009

The NCI CIRB has worked closely with the NCI's Cancer Therapy Evaluation Program (CTEP) in order to revise the process for the initial review of Adult phase 3 Cooperative Group trials. The revisions are in an effort to make these important trials available to investigators as quickly as possible with a continued focus on the thorough and rigorous scientific and ethical reviews currently completed by CTEP and the CIRB respectively.

The sequence of review has been redesigned such that final CTEP approval is no longer contingent upon CIRB review and approval. CTEP will provide its approval and the trial will be forwarded simultaneously to the CIRB and Cooperative Group. The CIRB will conduct its review of the trial at the same time that the Cooperative Group works to complete its final preparation for distribution to investigators.

It is anticipated that by allowing the Cooperative Group to make its final preparation for study distribution while the CIRB conducts its review, the total time to activation of Adult phase 3 Cooperative Group trials may be shortened. Additionally, the new process allows for the CIRB to have its own version of the informed consent document (ICD). The CIRB's own version of the ICD will be based on the Cooperative Group's model consent.

The information that follows below is a summary of the process changes and impact for CIRB participants.

Current Process for Initial Review

NCI's current initial review of Adult Cooperative Group Clinical trials is a linear three-step process.

- First, Cooperative Group clinical trials are reviewed by the NCI's Cancer Therapy Evaluation Program (CTEP). CTEP's review of the trial is aimed at ensuring that the trial is based on sound scientific principles and will result in usable data.
- Second, after CTEP review, the CIRB conducts its review of the trial, which focuses on safety of participants.
- Lastly, upon CIRB approval, CTEP reviews the changes made by CIRB and provides its final approval, and the trial is returned to the Cooperative Group for completion of final study preparation for distribution of the study to investigators.

Under this process, trials distributed by the Cooperative Groups have already received CIRB approval.

Revised Process for Initial Review

CTEP and the CIRB have redesigned the sequence of the current process for initial review of Adult Cooperative Group Clinical trials. In this new process effective May 1, 2009, final CTEP approval will no longer be contingent upon CIRB review and approval.

- CTEP will provide its approval and the trial will be forwarded simultaneously to the CIRB and to the Cooperative Group.
- The CIRB will conduct its review of the trial at the same time that the Cooperative Group completes its final preparation for study distribution to investigators.

If the Cooperative Group completes final preparation and is ready to distribute the trial prior to CIRB approval, it may proceed with distribution of the trial. In this event, notification will be posted to the CIRB website indicating the Board meeting date for review of the study as well as an anticipated CIRB approval date.

Impact on CIRB Participants

- If the CIRB has completed its review of the trial prior to Cooperative Group distribution, the trial will be CIRB-approved at time of distribution and the CIRB's review may be used in a similar manner as per the current process (see figure A below). It is the goal of the CIRB Operations Office to have study approval available to local IRBs and research staff at the time the trial is distributed by the Cooperative Group.
- In the event that the Cooperative Group distributes the trial prior to completion of CIRB review, local IRBs who wish to use the CIRB's review must wait until they are notified by the CIRB of study approval. (see figure B). A notification will be posted to the CIRB website, on the study-specific webpage, indicating the Board meeting date for review of the study as well as an anticipated CIRB approval date. When the study has been CIRB-approved, local IRB and research staff will be notified via email of the approval and the documents will be posted on the CIRB website, per the usual processes.
- If the protocol was changed during CIRB review, the Cooperative Group will distribute an amendment encompassing all of the modifications that occurred during CIRB review. Sites with local IRB approval of the study (i.e. sites that did not wait for CIRB approval or are not enrolled in the CIRB) must submit this amendment to their local IRB for review.

Sites enrolled in the CIRB Initiative are encouraged to wait for CIRB approval and use the CIRB's review as per the current process.

CIRB's Version of the Informed Consent Document

Starting May 1, 2009, trials approved by the CIRB will have the CIRB's own version of the informed consent document (ICD). The CIRB's own version will be based on the Cooperative Group's model however will reflect changes made by the CIRB to increase study participant protections. All changes appearing in the CIRB's own

version will have prior approval by the study's lead Cooperative Group. Local IRBs who have accepted facilitated review of the study should download and use the CIRB's version of the ICD from the CIRB website. The CIRB's version of the ICD will also be available on the CTSU website. Previously, local IRBs and research staff were advised to use the informed consent document posted to the Cooperative Group website; this is no longer the case.

Local IRBs and research staff from institutions using the CIRB's reviews, as evidenced by submission of the Facilitated Review Acceptance Form, should use only the CIRB's version of the Informed Consent Document as posted to the CIRB website.

Revising the CIRB's version of the ICD to accommodate local context concerns is still permissible and the revisions should comply with Cooperative Group guidelines pertaining to revising the ICD. A Spanish language translation of the CIRB's version of the ICD will be available on both the CIRB and CTSU websites. Please note that there may be a delay between the posting of the CIRB's approval and the posting of the Spanish language translation to allow sufficient time to translate the document.

Additional Support for CIRB Participants

The CIRB and CTSU will be taking several new actions to ensure that local IRBs and research staff can easily find out the CIRB status of any new trial distributed by a Cooperative Group. These actions include the following:

- CIRB-approved trials will appear as they do now with all review documents readily available and will be included on the study menu on the Participant's Side of the CIRB's website at www.ncicirb.org. New trials still in CIRB review will appear with the date of CIRB review and an estimated CIRB approval date.
- If CIRB approval occurs after the lead Cooperative Group has distributed the trial to investigators, the CIRB will notify all local IRB and research staff included in their database through a study specific email. As usual, the bi-monthly Study Activity Update will include the listing of documents that have been posted in regards to the study recently approved.
- The CTSU will provide information on its website if CIRB approval is pending for a new trial at time of distribution by the Group.

The CIRB, CTEP, and the Cooperative Groups understand that many local IRBs and research staff have successfully incorporated the CIRB into their local processes and are benefiting from the economies of time and effort provided by the CIRB. We wish to assure you that all phase 3 Cooperative Group trials will continue to receive CIRB review and facilitated review may be utilized for every trial approved by CIRB.

We welcome your questions and/or feedback. Please contact the CIRB Helpdesk via email at ncicirbcontact@emmes.com or by phone at 1-888-657-3711 where your input will be tracked and you will receive a prompt response to any questions.

Thank you for your continued support of the CIRB.

New CIRB Initial Review Processes

Figure A: CIRB Approves Study Prior to Group Distribution

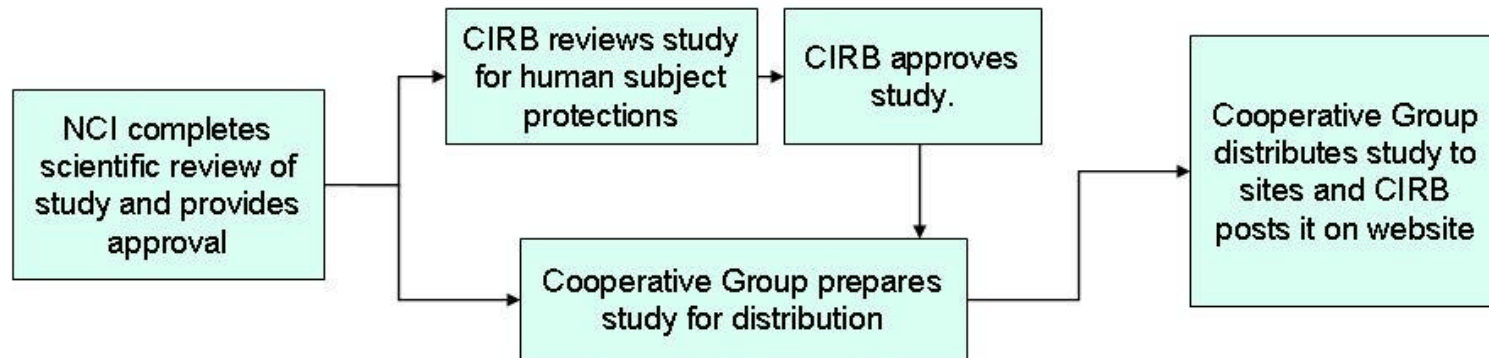


Figure B: Group Distributes Study Prior to CIRB Approval

