

Want to speed up your IRB process?

We have found that the number one problem causing delays in the IRB process is incomplete paperwork.



So we designed this document to help you answer the more difficult narrative questions in a more complete manner. This will help ensure that the IRB has all the information needed to evaluate your study.

Please note that all your responses must be specific to your protocol. The example answers in this document are provided to enhance understanding of the type of information the IRB is requesting.

In addition, the IRB staff is happy to assist you with your submission documents.

Please call us at 439-6053 if you have questions.



### **Narrative question 3B**

#### **Is this a multi-site study?**

##### **What does this question mean?**

Answer: A multi-centered study is one where different PIs at different institutions are conducting the same study.

**Give me an example:** a multi site clinical trial or a project performed jointly with another institution.

(A single PI conducting a study at two different schools is not multi-site by this definition).

##### **So if this project is a multi-centered study, then what do I need to do?**

Under question 3B on the narrative, provide complete answers to questions 1, 2; answer question 3 if applicable.

##### **Why is the IRB asking these questions?**

It's important for the IRB to know who is responsible for making sure that there will be management of information in a study where different investigators will be collecting data.

Suppose you are a PI at ETSU and you are working with another PI at another university on the same study. What if a participant has a problem or the lead investigator finds that a question on the survey is consistently not answered and the survey needs to be changed? Who is responsible for communicating problems to all the investigators or making sure that all the investigators know about a proposed protocol change?



## **Narrative question 4**

### **List all study staff.**

#### **What does this question mean?**

This means that all study staff must be listed in this chart by name and their role in the study. Be sure to list yourself as the PI on the first line. Complete the first and second column and the IRB staff will complete the third column. (There is an additional page available on the web if needed.)

Note that every study staff member **must** have current IRB training in human subject protection (training instructions and link available on the IRB website). Approval **will not** be issued until this requirement is met.

#### **So if my study is a VA study, then what do I need to do?**

If this is a VA study, answer the following request which is located below the chart:  
"If this is a VA study, indicate who will be conducting the consent interview or obtaining consent and explain the training provided."

#### **Give me an example of a response for the VA question:**

Example: The PI and/or the study coordinator will be obtaining consent for this study. Both have current human subjects training. In addition, the study coordinator will attend the sponsor's investigator meeting and will be provided additional training by the PI regarding the details of this specific protocol before enrollment begins.

#### **Why is the IRB asking these questions?**

Listing study staff is required for several reasons, one of which is that the IRB must verify that all study staff have completed human subjects training before a study can be approved.

As for the VA request, the VA requires that if someone other than the investigator will conduct the interview or obtain consent, then the investigator must formally delegate this responsibility and the delegated person must have received appropriate training to perform this activity. Training must include current IRB certification and protocol-specific training.



## **Narrative question 5-**

### **"The objectives of the study are.."**

#### **What does this question mean?**

Describe the purpose(s) of the study. Why are you conducting the research?

#### **Give me an example :**

Example of a detailed response:

The objectives of this study are:

- a. To determine whether providing detailed completion instructions in a clickable format within IRB submission documents will improve the completeness of IRB submission packets
- b. To determine whether the addition of detailed instructions in IRB submission documents improves researcher satisfaction with the submission process
- c. To determine whether the addition of detailed instructions in IRB submission documents reduces the time from submission to approval of the project

Example of an inadequate response:

To see if adding instructions helps

#### **Why is the IRB asking this question?**

Federal regulations require that the IRB determine whether there is a balance between risks, benefits, and the importance of the knowledge that may be expected to result from your study. Clearly and specifically stating the objectives of your project begins to provide information about knowledge you may learn from this project.



### **Narrative question 7b**

**“If this is a VA study, will non-veterans be participating?” and “If yes, what is the rationale for using non-veterans?”**

#### **What does this question mean?**

If your study is not a VA study, just leave this one blank. If your study is a VA study, this question is asking whether you want to only enroll veterans or if you want to also include non-veterans in your study.

#### **Give me an example of a complete response:**

Example: This VA study seeks to enroll non-veterans as well as veterans. The rationale for enrolling non-veterans is that this study compares participants with normal hearing to those with significant hearing loss. As hearing loss is a common diagnosis among veterans, there are insufficient veterans with normal hearing to achieve the sample size necessary for this study.

#### **Give me an example of an incomplete response:**

Not enough veterans

#### **Why is the IRB asking these questions?**

VA regulations state that non-veterans may be entered into VA approved research studies ONLY when there are insufficient veterans available to complete the study. Therefore, the ETSU/VA IRB cannot approve a VA study enrolling non-veterans unless the IRB determines that there are not enough veterans to complete the study.



### **Narrative question 7c**

“Does the list of participants for this study include vulnerable populations (populations that are likely to be vulnerable to coercion or undue influence, such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons)  Yes  No

If yes, describe the additional safeguards included in this study to protect the rights and welfare of the participants.”

### **What does this question mean?**

The first question requires you to consider the populations that might be enrolled in your study. Are there any populations that are vulnerable and will require extra protections?

The second question asks how you as the PI will build in extra safeguards to make sure that you protect their rights and welfare.

### **Give me an example of a thorough response:**

Example: This study will involve analysis of maternal-child interaction immediately after delivery. This study incorporates the following additional safeguards:

1. A packet of information about this study will be provided to prospective participants during a routine obstetrical doctor visit rather than at presentation in labor. This will ensure that the mother has ample time to consider whether she wants to participate in this study and is not making this decision under the duress of labor. Mothers will be encouraged to take the packet of information home and discuss the study with their family. They may enroll in the study at any of their subsequent routine doctor visits. Mothers in active labor will not be approached for enrollment in this study.
2. The consent process/enrollment will be conducted by a member of the study staff who is not actively involved in the medical care of the patient. This will help ensure that participants clearly understand that choosing not to participate will not have any impact on their normal medical care.
3. Refer to Supplemental Submission form for Pregnant Participants for additional information.

**Give me an example of an incomplete response:**

Consent will be obtained.

**Why is the IRB asking these questions?**

Federal regulations require that the IRB determine that there are appropriate safeguards in your study to protect the rights and welfare of vulnerable participants. Your study can not be approved unless the safeguards are determined to be present and appropriate.



**Narrative question 7d**

“Describe how the selection of participants is equitable in relation to the purpose of the research and the setting in which the research will be conducted.”

**What does this request mean?**

The first question requires you to evaluate 3 considerations and their relationship.

1. Selection of participants (which groups are you selecting to be in your study)
2. The purpose of the research (see question 5)
3. The setting in which the research will be conducted

**Points to consider:**

1. Does the nature of your research require using the population you have proposed?
2. Are there any groups of people who might be at more risk in this research and who should not be included? If so, be sure to detail how you will identify those who should not be included.
3. Would it be possible to conduct your study with participants who are less vulnerable?
4. Are any potential benefits or burdens distributed fairly?
5. Are you excluding participants of certain gender, age, ethnic groups, etc, and if so, what is the scientific basis for the exclusion? **Ex:** conducting a survey of only 2nd grade boys, explain why other grades and girls will be excluded

**Give me an example of a thorough response:**

The purpose of this research study is to examine the safety and efficacy of investigational drug X for heart failure. As the drug has previously been evaluated in Phase I trials in healthy volunteers, it is now necessary to evaluate efficacy in populations with the target disease of congestive heart failure. As drug X is known to affect kidney function, participants whose kidney functions tests are below normal will be excluded to minimize risks to this group. As noted in the procedure section of the narrative, BUN and creatinine will be drawn at baseline and any participant whose values for both tests are outside of the normal reference range will not be enrolled. Flyers will be placed in the physician offices of all investigators in this study for recruitment purposes and any patient who expresses a desire to participate and meets the inclusion/exclusion criteria (see question7h) is eligible for enrollment.

**Give me an example of an incomplete response:**

Selection is based on inclusion criteria.

**Why is the IRB asking this question?**

Federal regulations state that the IRB cannot approve a study UNLESS the IRB determines that the selection of subjects is equitable. This helps ensure that the benefits and burdens of research are distributed fairly.



**Narrative question 8c**

**Is a waiver or alteration of consent process or a waiver or alteration of consent documentation being requested?**

**What does this question mean?**

The federal rules require that a signed informed consent that has many required elements must be obtained BEFORE any participant can be enrolled in research. This question is asking whether you are requesting that the IRB waive this requirement in one form or another.

The federal rules allow several ways in which this rule can be waived by an IRB. One way is to allow the IRB to totally waive the requirement for a consent process. This is called a **Waiver or Alteration of the Requirement to Obtain Informed Consent**. (example of previous study where the IRB granted this: chart review of medical files from 10-20 years ago)

Another potential path is to allow the IRB to alter the requirement for informed consent. For example, this pathway allows the IRB to approve a consent process that does not include all the normally required pieces of information.

A different pathway allows the IRB to approve a **Waiver of the Requirement for Written Documentation of informed Consent**. This means there is still a complete consent process, but researchers are not required to obtain the participants' signature. (example of previous study where the IRB granted this: internet study that has an introduction with all the required language and people show their decision to participate by clicking on a button)

If you are requesting any type of waiver, then you must provide a justification.

The samples provided below are guides for you to use. Keep in mind that the answers given will be protocol specific. Your request for a waiver does not guarantee you will be granted the waiver because the IRB makes the final determination.

**Give me an example of a thorough response:**

Answer this question by providing information relative to the rules the IRB has to follow. Refer to the following examples.

Approval for a [Waiver or Alteration of Requirement to Obtain Informed Consent](#) could be granted under

**[45 CFR 46. 116(c)]** or **[45 CFR 46. 116(d)]** .

A sample for category [\[45 CFR 46. 116\(d\)\]](#) is provided:

The research involves no more than minimal risk to the participants because (**state your reason here**). The waiver or alteration will not adversely affect the rights and welfare of the subjects because (**state your reason here**). The research could not practicably be carried out without a waiver or alteration because (**state your**

**reason here)** and providing participants additional pertinent information after participation is not appropriate because (**state your reason here**).

Approval for a [Waiver of Requirement for Written Documentation of informed Consent](#) could be granted under [45 CFR 46. 117(c)(1)] or [45 CFR 46. 117(c)(2)]

[A sample for category \[45 CFR 46. 117\(c\)\(1\)\] is provided:](#)

The only record linking the participants and the research would be the consent document because (**state your reason here**). The principal risk would be potential harm resulting from breach of confidentiality because (**state your reason here**). Each participant will be asked whether he or she wants documentation linking the participant with the research, and the participant's wishes will govern (**If this determination is made, the PI must submit an Informed Consent Document to be used for this purpose**)

[A sample for category \[45 CFR 46. 117\(c\)\(2\)\] is provided:](#)

The research involves no more than minimal risk to the participants because (**state your reason here**) and the research involves no procedures from which written consent is normally required outside of the research context because (**state your reason here**). **TIP:** Sample Plan located at [www.etsu.edu/irb](http://www.etsu.edu/irb). Scroll down to "Waivers" and click on "Click here for sample plan". If using this sample letter, make sure to write it specifically for your research.

**Give me an example of an incomplete (and incorrect) response:**

This is a chart review. No people are involved.

**Why is the IRB asking this question?**

Federal regulations state that the IRB cannot approve a study UNLESS it meets the rules concerning informed consent.



## **Narrative question 11a**

“How does this study use procedures which are consistent with sound research design and which do not unnecessarily expose participants to risks?”

### **What does this question mean?**

Before a study can be approved, the IRB is required to determine that risks are minimized. The regulations note two specific methods by which this may be accomplished. This question requires information about one method (see next question about the second method).

#### **Points to consider:**

1. Have you considered physical risks, psychological risks, economical risks, and social and legal risks?
2. Can alternative or fewer procedures answer the scientific question and reduce the likelihood or magnitude of harm?
3. Have you built in adequate safeguards into your research design? For example, does your proposed study require frequent monitoring, coding of data for confidentiality, or the presence of trained personnel for procedures?
4. If your study involves a blinded design (investigator and/or participant don't know which treatment a participant is receiving), is there a mechanism to break the blind if necessary?
5. Are there risks that cannot be avoided? If so, how can you reduce or manage those risks? Are there precautions, safeguards or alternatives that can be built into the study design?
6. Have you provided information about the competence of the investigators/ study staff? (for example, if the study requires a blood draw, discuss the qualifications of the study staff member who will be performing this task.
7. Have you demonstrated how your study is designed to yield useful data?
8. Have you provided complete information to the IRB regarding the scientific rationale supporting your proposed research?
9. Have you provided information about the statistical basis for your design/sample

size?

**Give me an example:**

As drug X in this study is known to affect kidney function, blood draws to assess kidney function will be collected weekly. The study coordinator, a certified medical technician, will collect the blood samples. The PI will review the lab results within 24 hours of collection and will immediately withdraw the participant per protocol if values are outside the normal reference range.

The use of a double-blind design in this study will control for undue bias on the part of the research team. Sealed envelopes containing the code are stored in a locked cabinet in the PI's office. All investigators have been trained on the procedures should an individual's treatment group need to be determined.

The sample size for this protocol was determined on the basis of a power analysis conducted by a statistician (attached to narrative).

**Give me an example of an incomplete response:**

This double-blind study will be conducted in the clinic.

**Why is the IRB asking this question?**

Federal regulations state that the IRB cannot approve a study UNLESS the IRB determines that risks have been minimized.



**Narrative question 11b**

"Whenever appropriate, how does this study use procedures already being performed on the participant for diagnostic or treatment purposes?"

**What does this question mean?**

Before a study can be approved, the IRB is required to determine that risks are minimized. The regulations note two specific methods by which this may be accomplished. This question requires information about another method to reduce

risks.

Points to consider:

1. Are procedures that can answer the scientific question being done anyway?
2. If so, can the data from those procedures be used to reduce the likelihood or magnitude of harm?

**Give me an example:**

If participants in this study have already had their cholesterol checked within the last month, then those results will be used for this research study rather than requiring additional blood draws.

In addition, if participants have had a chest x-ray within the last year, those results will be utilized rather than exposing participants to an additional x-ray.

**Give me an example of an incomplete response:**

Some previous tests will be used.

**Why is the IRB asking this question?**

Federal regulations state that the IRB cannot approve a study UNLESS the IRB determines that risks have been minimized.



**Narrative question 11c**

“ Is the research more than minimal risk?  Yes\*  No

\*If yes, does the research involve an intervention?  Yes\*\*  No

\*\*If yes to both questions, is there a data safety monitoring committee or board to review the study for safety?

Yes  No

If yes, describe the timing of reviews and reports and planned interim analysis”.

If no, provide a general description of the data and safety monitoring plan.

## **What does these questions mean?**

Before a study can be approved, the IRB is required to determine that, when appropriate, the research plan makes adequate provision for monitoring the data collected to ensure the safety of subjects.

The IRB has determined that “when appropriate” is when the study is more than minimal risk and involves an intervention.

## **So what is minimal risk?**

Minimal risk means that the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.

Note: You can make the initial evaluation but the IRB makes the final determination of risk level.

## **So what is an intervention?**

**Intervention** is defined as including both physical procedures by which data are gathered (for example, venipuncture) and manipulations of the participant or the participant’s environment that are performed for research purposes. 38 CFR 16.102(f) notes that “an intervention includes all physical procedures by which data are gathered and all physical, psychological, or environmental manipulations that are performed for research purposes.”

Is the answer is: yes, my study is more than minimal risk and  
yes, my study involves an intervention, then what?

Then you are required to answer the remainder of the questions on number 11.

**Give me an example of a data and safety monitoring plan for a study that is more than minimal risk, involves an intervention, and does not have a data monitoring committee :**

## Sample Data Safety Monitoring Plan

The individuals responsible for data safety and monitoring will be . A conflict of interest will be avoided by .

Quality control will include regular data verification and protocol compliance checks by .

will complete (weekly, monthly or other time period) reports detailing the study progress and subject status, any adverse events, and any protocol deviations. Protocol adherence will be monitored by .

Throughout the study, will monitor the participants for adverse events. Events determined by the Principal Investigator (PI) to be unanticipated problems involving risks to subjects or others (UPIRTSOs) will be reported by the PI to the IRB (and R&D if applicable) within 10 days per policy. Adverse events that are determined by the PI to not be UPIRTSOs will be reported per IRB policy at the time of continuing review. In addition, the sponsor will be notified of by .

All study staff members will be informed by about any UPIRTSOs. If any protocol changes are needed, the PI will submit a modification request to the IRB (and VA R&D if applicable). Protocol changes will not be implemented prior to IRB approval unless necessary to eliminate apparent immediate hazards to the research subjects. In such a case, the IRB will be promptly informed of the change following implementation (within 10 working days).

Statistical review of the study will be conducted by at (describe what timepoints). Interim analyses will be performed by to assess . If occurs, consideration will be given to stopping the study early. In the event of early stopping of the study, the IRB will be promptly notified.

### **Give me an example of an incomplete response:**

Data will be reviewed quarterly.

### **Why is the IRB asking this question?**

Federal regulations state that the IRB cannot approve a study UNLESS the IRB when appropriate, the research plan makes adequate provision for monitoring the data collected to ensure the safety of subjects.



## **Narrative question 12b**

“Describe how the risks to participants are reasonable in relationship to anticipated benefits, if any, to participants, and the importance of the knowledge that may reasonably be expected to result.”

### **What does this question mean?**

Before a study can be approved, the IRB is required to determine that risks to participants are reasonable in relationship to anticipated benefits, if any, to participants, and the importance of the knowledge that may reasonably be expected to result.

Points to Consider:

1. In evaluating this information, the IRB will consider if the importance of the research aims is clear and if the research is likely to achieve its proposed aims. Physical, psychological, social, economic and legal risks must be considered.
2. The IRB must determine the following:
  - The likelihood and magnitude of the risks and potential benefits, and understand the importance of the knowledge reasonably expected to result.
  - the range of harm, including physical, social, economic, psychological, and legal harm.
  - the range of benefit. Benefit can take the form of therapy, education, information, resources or empowerment. The benefits can be directed at participants or their community as a whole.
  - The validity of research design must be taken into consideration in determining the risk benefit ratio
  - What is the importance of the knowledge expected to result from the research?

3. **When answering this question**, consider the following:

Risks to participants; Narrative question # 10

Benefits to participants; Narrative question # 12

The importance of the knowledge that may be expected to result; Narrative

question #5

**Give me an example of an incomplete response:**

The study is minimal risk.

**Why is the IRB asking this question?**

Federal regulations state that the IRB cannot approve a study UNLESS the IRB determines that risks to participants are reasonable in relationship to anticipated benefits, if any, to participants, and the importance of the knowledge that may reasonably be expected to result.



**Narrative question 15**

Describe how the privacy of participants will be protected. (Note: privacy is about the person and their rights as opposed to confidentiality, which is about data).

**What does this question mean?**

Before a study can be approved, the IRB is required to determine there are adequate provisions to protect privacy.

Points to Consider:

1. Privacy refers to the person rather than the data. Consider issues such as whether the participants will be comfortable in the research setting when completing a survey, questionnaire or being interviewed and whether the participants will think the information being sought is any of the investigator's business.

**Examples:**

- when participants are completing a paper survey or questionnaire or undergoing a physical exam, will the participants be in a private room? If not, how is their privacy maintained while completing the survey or questionnaire?
- When participants are completing online surveys or questionnaires, will they be

completing them in a place of their choice?

**Give me an example of an incorrect response:**

Data will be stored in locked cabinet (This addresses confidentiality, not privacy).

**Why is the IRB asking this question?**

Federal regulations state that the IRB cannot approve a study UNLESS the IRB determines that adequate provisions to protect privacy are in place.