

# ***Western Institutional Review Board at Yale University***

***Revised: April 20, 2007***

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## ***Introduction:***

In September 2003, Yale University entered into an agreement with the Western Institutional Review Board (WIRB) of Olympia, Washington to serve as an additional Institutional Review Board (IRB). WIRB works in concert with the Human Investigation Committee (HIC) and is considered a component of the current IRB system within Yale University. Reviews conducted by WIRB must meet the eligibility criteria noted below.

## ***Protocols Qualifying for WIRB Review***

The types of studies that qualify for WIRB review must meet the following criteria:

- Research projects funded by Pfizer, Inc. under the Pfizer Bioimaging Research Collaboration and involving non exempt human subject research. Two research scenarios are possible.
  1. A project performed exclusively at facilities owned by or operated by Yale University and for which a full time Yale faculty member serves as principal investigator, OR
  2. A project conducted by Yale investigators in collaboration with researchers from Pfizer and the research is conducted at the Pfizer Clinical Research Unit (CRU) and at facilities owned or operated by Yale University.
- Protocol applications for research projects that have approval by the HIC and the Institutional Official for external IRB consideration.

## ***Protocol Submission Process***

Protocols qualifying for WIRB review must first be submitted to and administratively reviewed by the HIC. The HIC is not responsible for conducting the formal IRB review or approval of the research per se. However, Yale's agreement with WIRB requires that the HIC conduct an administrative review of any new research application prior to the protocol being submitted to WIRB. The HIC is also responsible for coordinating with Pfizer the joint submission of collaborative research studies that are conducted by Yale researchers in conjunction with Pfizer scientists at Yale and the CRU.

Investigators may not apply to WIRB directly for approval of a Yale-based study. The HIC is responsible for forwarding applications for initial review to WIRB. WIRB will communicate directly with the principal investigator after the protocol is received by WIRB and the HIC will receive electronic notifications regarding the protocol processing and approval.

For studies in which the majority of the research is conducted at the CRU and the PI is a Pfizer representative, then Pfizer will complete the submission form. The protocol, consent documents and other required documents (noted below) will be reviewed by the HIC and edited if required. The submission package will be sent to WIRB by Pfizer with a copy to the HIC. Controversial issues will be discussed and agreed to by both parties before the protocol is sent to WIRB for approval.

After receiving approval from the Bio-imaging Steering Committee to proceed with a research protocol, the investigator is required to compile a new application package and submit it to the HIC.

The application package for WIRB must include the following documents, signed when appropriate. The collection of these documents is referred to as the protocol submission packet.

- The WIRB Initial Review Submission Form.  
[http://www.wirb.com/shell.php?content=content/quick\\_download\\_forms](http://www.wirb.com/shell.php?content=content/quick_download_forms)
- The completed protocol application, either in the Yale format <http://info.med.yale.edu/hic/forms/index.html> or other format previously authorized by the HIC.
- A copy of the current medical license for the principal investigator, and other indicated licenses as appropriate. These documents must contain an expiration date.
- A Curriculum vita (CV) for principal investigator and each sub-investigator.
- The informed consent form and HIPAA Research Authorization Form(s) **or** a Compound Authorization form.  
<http://info.med.yale.edu/hic/forms/index.html#templates>
- HIPAA Request for Waiver of Authorization, if appropriate.
- Other materials, to be provided to the subjects, which are not included in the protocol, such as advertisements, questionnaires, subject diaries, etc.
- Approval documents from internal scientific committees, which are responsible for conducting a thorough review of research protocols **prior** to an HIC submission. These include the YNHH Radiation Safety Committee, the Institutional Biosafety Committee (IBC), the YNHH Radioactive Drug Research Committee, the Pediatric Protocol Review Committee (PPRC), the Scientific and Safety Committee (SSC) and the Yale Cancer Center Protocol Review Committee (PRC).
- If appropriate, both the Yale University Protocol Related Conflict Of Interest form and the WIRB Financial Interest Disclosure form.

If the research study involves an **Investigational New Drug (IND) or Biologic**, then a copy of the following must also be attached:

- Investigator's Drug Brochure;
- Food and Drug Administration Statement of Investigator Form 1572;
- Background Information for Food Supplements;
- The Yale University Institutional Biosafety Committee (IBC) approval, if necessary;
- Others as appropriate.

If the research study involves an **Investigational Device**, then a copy of the following must also be attached:

- A copy of the signed Investigator Agreement for protocols with an IDE **and** an FDA letter granting the Investigational Device Exemption (IDE); **OR**
- A letter from the study sponsor stating that the study is a non-significant risk device study; **OR**
- A letter explaining why the investigation is exempt from the IDE requirements under 21 CFR 812.2(c) or is otherwise exempt.

Each Yale research team member, who takes part in *research projects funded by the Yale-Pfizer Bioimaging Alliance*, must:

- read the Yale University COI policy and the Human Investigation Protocol-Related Conflict of Interest policy, **AND**
- sign the Attestation of Research-Related Conflict of Interest Form **AND**
- Any person indicating on the Attestation form that he/she, or their spouse, domestic partner or dependent child have a financial relationship with Pfizer, Inc. or any manufacturer of the product or interventions under investigation other than payment for the conduct of clinical research must complete the Protocol-Related Conflict of Interest Form and the WIRB Financial Interest Disclosure form and submit them with the protocol submission packet.

The Yale Protocol Related COI policy can be found at:

<http://info.med.yale.edu/hic/policy/index.html>

The WIRB Protocol Related COI policy can be found at:

[http://www.wirb.com/shell.php?content=content/inv\\_conflicts](http://www.wirb.com/shell.php?content=content/inv_conflicts)

The Yale Protocol related attestation form and COI form can be found at

<http://info.med.yale.edu/hic/forms/index.html>

The WIRB Financial Interest Disclosure form can be found at the end of the WIRB Initial Submission form:

[http://www.wirb.com/shell.php?content=content/quick\\_download\\_forms](http://www.wirb.com/shell.php?content=content/quick_download_forms)

Once a new application has been referred to WIRB by the HIC, any changes, amendments, or modifications should be sent directly by the principal investigator to WIRB via electronic submission.

## ***HIC Responsibilities***

The HIC is not responsible for IRB approval of WIRB-submitted studies. However, it is responsible for conducting administrative reviews of research studies prior to the protocol being submitted to WIRB. Upon receipt, the HIC will assign the protocol an internal tracking number. The HIC will then review the WIRB submission packet, ensuring its completeness. If the review reveals inadequate documentation, the HIC and the WIRB

Contact will decide whether it needs to be corrected prior to submission to WIRB or if it can be done concurrently with WIRB review.

The HIC administrative review will ensure compliance with specific Yale policies and also includes reviewing all Requests for Waiver of HIPAA Authorization and ensuring prior review by internal scientific review committees when required. The HIC will notify WIRB of outstanding issues noted during prior reviews.

The HIC may, at its discretion, conduct a follow-up review of WIRB-approved consent forms. Any problems identified during this review will be communicated to the WIRB Contact for resolution.

### ***Internal University Scientific Reviews***

Yale University policies require that the following internal scientific committees review protocols previous to IRB review. Thus, documentation of approval from the following committees must be included in the protocol submission packet when appropriate.

- **YNHH Radiation Safety Committee (RSC):** Reviews protocols involving the use for research in humans of ionizing radiation that is not the standard of care. The broad classes of research which must be reviewed by the RSC include:
  - a) Studies that use experimental drugs, diagnostics, or devices that emit ionizing radiation and
  - b) Protocols which propose any additional exposures to ionizing radiation that would not normally be a part of the subject's medical treatment. [link to policy]
- **Institutional Biosafety Committee (IBC):** Reviews research involving gene transfers, human pathogens and other biologic agents.
- **YNHH Radioactive Drug Research Committee (RDRC):** Oversees the use of radioactive materials prepared at the Yale Medical Center which require neither an IND nor FDA approval.
- **Pediatric Protocol Review Committee (PPRC):** Reviews all research conducted at the Yale School of Medicine that involves children with the exception of Pediatric Oncology, which is reviewed by the Protocol Review Committee noted below.
- **Protocol Review Committee (PRC):** Reviews all therapeutic research trials for cancer conducted at Yale.
- **Scientific and Safety Committee (SSC):** Reviews all research conducted at the General Clinical Research Center and under the CTSA.

Complete protocol submission packets will be sent by the HIC to WIRB either by a) facsimile, b) next day delivery by a national air courier service, or (c) U.S. mail.

## ***WIRB Responsibilities and Oversight***

WIRB will assume the IRB protocol oversight and perform IRB functions in compliance with federal regulations. WIRB will review and either approve or disapprove new protocols; review and approve, disapprove or modify consent forms; review and approve or disapprove the participation of the investigator(s); monitor adverse event reports; and maintain required IRB records. WIRB will conduct continuing review of study protocols appropriate to the degree of risk in such protocols, or at least an annual review of each study.

WIRB will contact the investigator or study coordinator directly to obtain additional information or necessary documents required for initial and continuing review. The HIC may assist WIRB in soliciting this information if WIRB has difficulty obtaining such information through the normal procedures of contacting the investigator or study coordinator.

WIRB will notify the HIC of any of the following: WIRB termination or suspension of a study; adverse events occurring at Yale or at other sites when Yale is the managing center in a multi-center trial; instances of serious or continuing noncompliance with the federal regulations or the requirements and the determinations of WIRB; WIRB monitoring reports and any other matter that comes to the attention of WIRB that adversely affects Yale's compliance with applicable regulations. WIRB will notify the HIC of its decisions to approve, disapprove, or recommend modification of research studies.

Effective October 1, 2005, investigators approved for new research studies are required by WIRB to confirm their acceptance of the requirements imposed by WIRB. Enrollment may not commence until the Investigator has accepted the WIRB's requirements. Investigators should review the Investigator Confirmation of Board Requirements form found at [http://www.wirb.com/shell.php?content=content/quick\\_download\\_forms#20](http://www.wirb.com/shell.php?content=content/quick_download_forms#20)

- If the Board's requirements are **acceptable**, the form should be signed and sent to WIRB. Enrollment may commence once the form has been submitted. Sites should retain a signed and dated copy of the form for their records.
- If one or more of the Board's requirements are **not acceptable**, the applicable box should be marked, explanatory comments should be provided, and the form should be sent to WIRB. Enrollment may not commence.

Investigators **MUST** return the form to WIRB in a timely manner **whether the investigator found the requirements acceptable or not.**

Please contact WIRB Client Services at (360) 252-2500 or 1-800-562-4789 if you have questions.

## ***Transferring Active Studies***

In order to assume the ongoing responsibility for each transferred study that was previously approved by the HIC, WIRB must receive the following: the WIRB Initial Review Submission Form; a copy of the protocol; the HIC's and any other IRB approval letter(s); any serious adverse events reported to the HIC or other IRBs with oversight responsibility and the investigator's curriculum vitae.

## ***Continuing Review Submissions***

The continuing or annual review of a research study is an automated process. WIRB will notify a principal investigator prior to a protocol's expiration date that a study is due for continuing review, which might be at intervals of less than one year as determined by WIRB. The principal investigator is required to complete all requisite documents and send them back to WIRB to ensure a timely review.

Investigators who may be considered to have a conflict of interest (COI) pursuant to Yale University's Protocol-Related COI Policy are required to submit the Yale University Protocol Related COI form and the WIRB Financial Interest Disclosure form to WIRB concurrent with the request for reapproval submission to WIRB.

## ***Quarterly Reporting***

Principal investigators are required to complete and submit four research study reports to WIRB each year. The forms are sent by WIRB to the principal investigator electronically and focus on the progress of the research to date, including study enrollment. WIRB will specify the date by which these forms must be completed. The principal investigator may designate another member of the research study team to complete the quarterly reports. Should investigators choose to have these forms sent to a correspondent he can do so by naming the correspondent in the protocol application. If the investigator does not name a correspondent in the initial application but later chooses to do so, a written request can be sent via email to the WIRB contact asking to add the correspondent and providing the appropriate contact information.

## ***Amendments***

In order to submit an amendment for WIRB review, the principal investigator should review the WIRB requirements at [http://www.wirb.com/shell.php?content=content/quick\\_change\\_research#change](http://www.wirb.com/shell.php?content=content/quick_change_research#change). It is suggested by WIRB to use the WIRB [Change in Research/Subject Recruitment Submission Form](#) to submit requests for review of changes to protocols, consent forms or subject materials; review of new consent forms and subject materials or review of new or modified recruitment materials. The completion and submission of this form will allow WIRB to review any changes in a research protocol, whether administrative or otherwise.

WIRB should also receive the HIC Protocol-Related Conflict of Interest Disclosure Form and the WIRB Financial Interest Disclosure form if the study is being amended to include an investigator who has a real or potential COI for the specific study being reviewed at WIRB.

### ***Subject Recruitment and Advertisements***

Principal Investigators must complete and submit the [Change in Research/Subject Recruitment Submission Form](#) to request WIRB review of any advertising or recruitment materials not considered during the initial review.

### ***Protocol Deviation Reporting***

Principal Investigators are required to report protocol deviations and violations to WIRB by completing and submitting the [Protocol Deviations & Violations/Unanticipated Problems Reporting Form](#). Reports received by WIRB are reviewed and assessed for their impact on subject safety.

### ***Adverse Event Reporting***

WIRB provides a Ten Day Adverse Event Form for reporting adverse events to WIRB. Principal Investigators are required to complete and submit the form when reporting only serious, unanticipated, related adverse events. These events must be reported within 10 working days of the PI being notified of the event. WIRB also requires that a log be submitted for only non-serious unanticipated adverse events. A copy of the Adverse Event Report form or the log should be forwarded to the HIC.

Deviations and violations that may adversely affect the rights, safety and/or welfare of subjects or the integrity of the research data must be reported to WIRB as unanticipated events within 10 days.

### ***Record Keeping***

WIRB will retain a comprehensive protocol file. WIRB will notify the HIC of its decisions to approve, disapprove, or recommend modification of research studies. A copy of all correspondence from WIRB regarding each individual protocol will be retained at the HIC office.

WIRB will also notify the HIC of any termination or suspension of a study; adverse events occurring at Yale or at other sites when Yale is the managing center in a multi-center trial; instances of serious or continuing noncompliance with the federal regulations or the requirements and the determinations of WIRB; WIRB monitoring reports and any other matter that comes to the attention of WIRB that adversely affects Yale's compliance with applicable regulations.

## ***Contact information for WIRB***

Written inquiries may be addressed to:

Western Institutional Review Board  
3535 Seventh Avenue SW  
Olympia, WA 98502-5010

Website information: <http://www.wirb.com/>  
Phone: (360) 252-2500 or (800) 562-4789

## ***Contact information for HIC***

Human Investigation Committee  
47 College Street, Suite 204  
PO Box 208010  
New Haven, CT 06520-8010

Website information: <http://info.med.yale.edu/hic/>  
Phone: (203) 785-4688  
Fax: (203) 785-2847