

SOP: Pre-review

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1 PURPOSE

- 1.1 This procedure establishes the process to pre-review a request for approval (approval of new research, continuing review of research, or modification to previously approved research) or a determination whether an activity is exempt Human Research or is not Human Research.
- 1.2 The process begins when the IRB receives a request for local IRB approval, including requests from other institutions when this institution is the IRB of record, e.g., for a Collaborative Study or Multi-Site Study.
- 1.3 The process ends when the information has been placed on the agenda for an IRB meeting or will be handled by Non-Committee Review.

2 REVISIONS FROM PREVIOUS VERSION

- 2.1 None.

3 POLICY

- 3.1 The addition of a previously approved protocol at a new site or sites that will be overseen by a principal investigator who will take separate and full responsibility for that site or those sites is considered a modification to previously approved research.

4 RESPONSIBILITIES

- 4.1 IRB staff members carry out these procedures.

5 PROCEDURE

- 5.1 If the submission is a response to modifications required to secure approval received within 30 days of the IRB review date:
 - 5.1.1 Evaluate whether the investigator made the required modifications.
 - 5.1.2 If the investigator made the required modifications, follow "SOP: Post-Review (HRP-052)" to issue an approval.
 - 5.1.3 If the investigator did not make the required modifications or made unrequested modifications, execute the "Request Pre-Review Clarification" activity from the investigator. Offer the investigator the opportunity to correct the submission.
 - 5.1.3.1 If the investigator will correct the submission, have the investigator make changes then execute the "Submit Changes" activity and stop processing the current submission until changes are received.
 - 5.1.3.2 If the investigator will not correct the submission, have the investigator execute the "Submit Changes" activity to resubmit and continue processing.
- 5.2 For all other submissions, complete Pre-Review Activity or review the previously completed Pre-Review Activity and revise as needed, considering the items on "WORKSHEET: Pre-Review (HRP-308)" and note all remaining contingencies in the "Final Contingencies" section.
- 5.3 If the information is not complete, contact the investigator by selecting the "Request Pre-Review Clarifications" Activity. Offer the investigator the opportunity to provide additional information.
 - 5.3.1 Continue processing once the investigator responds to the request for additional information.
- 5.4 If the request is for an initial approval and principal investigator is Restricted, contact the investigator. Explain that the investigator is Restricted, give the reasons, and indicate that if a new protocol goes to the IRB, the IRB policy is to disapprove the research. Offer the investigator the opportunity to withdraw the submission pending removal of the Restricted status.
 - 5.4.1 If the investigator withdraws the submission, stop processing the current submission.
 - 5.4.2 If the investigator will not withdraw the submission, discuss whether you may continue to process the submission with the IRB Manager.
- 5.5 Evaluate the most likely level of review using "WORKSHEET: Human Research Determination (HRP-310)", "WORKSHEET: Engagement Determination (HRP-311)",

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“WORKSHEET: Exemption Determination (HRP-312)”, “WORKSHEET: Expedited Review (HRP-313)”, and/or “WORKSHEET: Criteria for Approval for HUD (HRP-323)” as references:

- 5.5.1 If the request can be handled as a Non-Committee Review and the principal investigator is not Restricted, Follow “SOP: Non-Committee Review Preparation (HRP-031).”
- 5.5.2 If the request cannot be handled as a Non-Committee Review, place the protocol on the agenda for a convened IRB meeting in an IRB with appropriate scope.
- 5.5.3 If the request is a non-emergency individual patient expanded access use of an investigational drug for which an IRB waiver is requested, follow “SOP: Non-Committee Review Preparation (HRP-031)” and “SOP: All Emergency Use, and Compassionate Use (Device Only) and IRB Waiver for Individual Patient Expanded Access (Drug Only) Review (HRP-023).”

6 MATERIALS

- 6.1 WORKSHEET: Pre-Review (HRP-308)
- 6.2 HUMAN RESEARCH PROTECTION PROGRAM PLAN (HRP-101)
- 6.3 SOP: All Emergency Use, and Compassionate Use (Device Only) and IRB Waiver for Individual Patient Expanded Access (Drug Only) Review (HRP-023)
- 6.4 SOP: New Information (HRP-024)
- 6.5 SOP: Non-Committee Review Preparation (HRP-031)
- 6.6 SOP: IRB Meeting Preparation (HRP-040)
- 6.7 SOP: Post-Review (HRP-052)
- 6.8 WORKSHEET: Human Research Determination (HRP-310)
- 6.9 WORKSHEET: Engagement Determination (HRP-311)
- 6.10 WORKSHEET: Exemption Determination (HRP-312)
- 6.11 WORKSHEET: Expedited Review (HRP-313)
- 6.12 WORKSHEET: Criteria for Approval for HUD (HRP-323)

7 REFERENCES

- 7.1 None