**Instructions for Completing the PRO SmartForm**

**MCW/FH IRB New Project Submission Guide**

This document was developed to assist the MCW/FH research community in completing the IRB application. Here you will find definitions, expanded explanations, and additional information to guide you in providing information the IRB will need to review your research proposal. Providing the requested information in sufficient detail will reduce the possibility of delays in the review and approval of your project. Additional help text can be found on the right hand side of each section throughout the IRB application SmartForm.

Not all questions will be displayed when the IRB application is initially opened. The IRB application is based on a “*branching logic,*” meaning that different sets of follow‐up questions are presented depending on how you answer earlier, pivotal questions. For this reason, (i) you should always begin at the beginning of the application and answer questions in numerical sequence, and (ii) you should remember that if you change your answer to a pivotal question, subsequent sets of questions may “open up” or “close.”

A red asterisk (\*) preceding a question means that the question must be answered. If you don’t answer a required question, eBridge will give an error message when you try to advance to a new page. If you do not answer all required questions you will not be permitted to submit your completed application.

**SmartForm Section 1.0**

The Children’s Hospital IRB has jurisdiction over many but not all projects involving minors, so it is important to determine jurisdiction before beginning an application. When a project involves both minors and adults; the MCW/FH and CHW IRBs will coordinate review so the investigator only has to submit one application. To determine which IRB will provide the review please:

* Complete the Investigator Reliance Request Form [Investigator Reliance Request Form](http://www.mcw.edu/hrpp/forms.htm) in order for the IRB office to discuss your project with you
* Email the form to the [IRB Office](mailto:irboffice@mcw.edu) to initiate the process

**NOTE:**

* Minors are defined by regulations and IRB policy as “vulnerable subjects.” Additional safeguards are required. You must be familiar with the DHHS safeguard requirements (45 CFR 46 Part D, 401‐409) and FDA safeguard requirements (21 CFR 50, subpart D) as applicable and you must address these requirements in your IRB application (section 12A).
* The age of consent for research varies by state within the United States and from one country to the next. Thus the investigator and study team must be familiar with the relevant state or national laws for every study location, if minors will be subjects at those locations. The relevant states and countries, and their corresponding definitions of “age of consent for research” must be spelled out in the IRB application (section 12A).

**SmartForm Section 1.3**

The Principal Investigator (PI) is to be listed here.

* PI must be a MCW faculty member, a person designated as “CTSI scientist”, a Froedtert nurse, a Froedtert Pharmacist, CMH physician, St. Joe’s West Bend Physician, or BloodCenter of Wisconsin Investigator
* An investigator may not be a PI until Human Subject Research training is completed. Training includes:
  + CITI training
  + Banking training if collecting and storing data and/or biospecimens for future unknown research
  + DoD training if the research project is funded by the Department of Defense (DoD)
* Please see IRB SOP: Requirements and Qualifications to serve as a PI for more information
* If there are no other study team members, PI will also be listed as the Primary Contact
* [Significant Financial Interest (SFI)](http://www.mcw.edu/officeofresearch/FCOI-R.htm) must be reported

**SmartForm Section 2.1**

Everyone involved in the project must be listed here along with their designations. PI does not need to be listed again. Please list all individuals who will conduct any of the following activities in the project:

* Obtaining information about living individuals by intervening or interacting with them for research purposes;
* Obtaining identifiable private health information (PHI) about living individuals for research purposes;
* Obtaining the voluntary informed consent of individuals to be subjects in research;
* Studying, interpreting, or analyzing identifiable PHI or data for research purposes, and, collaborating colleagues at other institutions who are helping you with the work at this site.

Each study team member must complete and maintain Human Subject Research training. This includes:

* CITI or equivalent
* Banking training if collecting and storing data and/or biospecimens for future unknown research
* DoD training if the research project is funded by the Department of Defense (DoD)

Within this table of project team members you will be asked to designate 1) a PRIMARY CONTACT, 2) who can have edit privileges, 3) who should receive eBridge email correspondence, 4) who will consent and also 5) report Significant Financial Interests (SFI).

* **Edit**: allows individuals to edit the IRB application, open/edit Continuing Progress Reports, Amendments, and/or Reportable Events for this project.
* **Email**: who should receive email communications about the project via eBridge. The IRB Office recommends at least one other person is selected to receive email notifications in the event the PI is out of the office.
* **SFI**: The PI has an explicit responsibility to be familiar with the MCW Financial Conflicts of Interest in Research policy, and to determine whether any project team member or their immediate family members has a potential conflict of interest related to the research project.

**SmartForm Section 3.1**

Which category best describes the type of project you are submitting for review?

* **Research study**: is guided by hypotheses or research questions, framed by a project design and protocol, and will provide an answer to the research questions. Data and biospecimens obtained for a project will be used for that specific, protocol-defined purpose and nothing more. Studies in which biospecimens/data are obtained FROM an existing MCW/FH IRB approved bank are considered research studies.
  + Most projects are considered to be (a) “Research study.” When in doubt, check this one.
  + If you are proposing a research study but some data/biospecimens will be set aside for “future, unspecified research” (i.e. banking), then select either (b) or (c).
  + **NOTE: if you are proposing a research project that will set aside some data/biospecimens for an already IRB approved local bank (new local bank doesn’t need to be created), then select (a) “Research study.”**
* **Local bank:** when the Investigator plans to save data or biospecimens for future, unknown research purposes at MCW, Froedtert Hospital, Children’s Hospital of Wisconsin, the Blood Research Institute Community Memorial Hospital, or St. Joseph’s Hospital (or a location controlled by one of those institutions).
  + If you are proposing to only build a “local bank” – check (d) creating a new local bank
  + If you are proposing a research project and would like to set aside some data/biospecimens for “future, unspecified research” and any of the set aside banked data/biospecimens will be kept on the MCW campus – check (c).
  + If you are proposing a research project that involves at least one local bank AND at least one new distant bank – check (c).

\*\*\*If you choose option (c) “Research study plus creating a new local bank” you are obligated to submit two separate eBridge submissions.

* First application (3.1=c) should describe the research project.
* Second application (3.1=d) should describe the bank – Please reference the MCW IRB Banking SOP for more information.
* **Distant bank**: collection of data/biospecimens for a bank at another institution
  + IRB will verify the consent form asks subjects for permission to send their data/biospecimens to the distant bank
  + IRB will verify that distant bank has its own independent IRB oversight
  + MCW/FH IRB does not need to register or monitor the distant bank
  + If the project involves ‘distant banking’ only, please choose option (b) Research study plus distant bank
* **Treatment/Emergency Use**: check this option if you are a clinician who simply wants to treat a patient with an agent that the FDA considers to be an “investigational article” – i.e. a drug, biologic, medical device, or molecule for imaging – and no research whatsoever is intended.
  + Items (e) and (f) are reserved for proposal to use investigational articles for clinical purposes
  + Phase IV drug studies do not qualify for selecting (e) or (f).
* **Deferral to NCI CIRB**: for Cancer Cooperative Group studies in which the NCI CIRB will be the IRB of record

**SmartForm Section 3.1.2**

* **The IRB’s broad scope of ‘research treatment/intervention’ includes**:
  + all types of biomedical, psychological, psychosocial, and educations interventions
  + interventions delivered to individuals, small groups or entire communities
  + all treatments with an investigation article (drug, biologic, medical device)
  + all treatments being evaluated for safety or efficacy
  + educational or community interventions designed to make changes (improve knowledge, change attitudes, provide better access to care)

**SmartForm Section 3.2**

* Regardless of approval status, any use of a drug, device or biologic in the project should be checked in this section

**SmartForm Section 3.4**

What type of review is being requested?

* **Full Committee**
  + Greater than minimal risk
  + Will be reviewed by 1 of 4 Full Committees which meet twice a month each
* **Expedited**
  + Project is minimal risk and all activities fall into one or more of the [categories](http://www.hhs.gov/ohrp/policy/expedited98.html) for expedited review under 45 CFR 46.110
  + Does not mean a shorter time from review to approval
  + Will be reviewed by the Minimal Risk Committee
* **Exempt**
  + Minimal risk and all activities fall into one or more of the [categories](http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html#46.101) for exempt review under 45 CFR 46.101(b)
  + Project must still be submitted to the IRB for determination of exemption
  + Will be reviewed by the Minimal Risk Committee

**SmartForm Section 3.5**

Use of identifiers – indicate the level of “subject identification” you require to **BEGIN** this work

* Response choices are listed in hierarchical order
  + Most projects involve “identified data.” When in doubt, check this option
  + If you plan to access identified data and then later de-identify or code the data, the data is considered to be “identified,” select (A)
  + If any member of the MCW/FH Community has real or potential access to identifiers or a key code, the data is considered to be “identified,” select (A)
  + Per MCW/FH corporate policy, MCW/FH clinical information may not be rendered as “limited data sets.” Please select “identified” option (A)
* HIPAA Identifiers for Protected Health Information (PHI) include the following:
  + 1. Names or initials
  + 2. All geographic subdivisions smaller than the state
  + 3. All elements of dates smaller than the year (i.e. birth date, admission/discharge date, date of death, etc) if age > 89
  + 4. Phone numbers
  + 5. Fax numbers
  + 6. Email addresses
  + 7. Social security number or portion thereof
  + 8. Medical record number
  + 9. Health plan beneficiary
  + 10. Any other account numbers
  + 11. Certificate/license numbers
  + 12. Vehicle identifiers
  + 13. Device identification numbers
  + 14. Web URL’s
  + 15. Internet IP address numbers
  + 16. Biometric identifiers
  + 17. Full face photographs or comparable images
  + 18. Any other unique number, characteristic or code

**SmartForm Section 4.1**

* Deception studies:
  + Designed to give subjects misleading information or withhold information about the purposes or procedures
  + Placebo controlled studies are not considered deception studies unless the subjects are NOT told they may be assigned to a placebo arm
* Direct contact with subjects:
  + Includes interaction/intervention of any kind (ex. observation, contact by mail, phone, or internet, or biospecimen-taking)

**SmartForm Section 10.4**

* If a drug, device or biologic is being used in this study, but no IND or IDE is needed, what is the FDA status of the article you are using. For example:
  + Approved drug/device/biologic
  + Approved, but not for the proposed indication/population of this study (off label use)
  + 510(k) cleared
  + Non-Significant Risk device

**SmartForm Section 12.2**

* **Traumatized, sedated, or comatose patients**
* **Issues of cognitive or decisional impairment**
* **Persons with developmental disabilities - neurologic or psychiatric**
* **Persons with mental illness**
* **Elderly ‐age 70 and over**
* **Nursing home residents**
  + Subjects in these categories are not automatically considered to be “vulnerable subjects,” but – depending on the study design and the recruitment plan – the IRB may deem them to be vulnerable, and thus in need of additional safeguards. You should propose safeguards tailored to your project for the IRB to consider. If a subset of subjects are likely to be cognitively compromised, you must be familiar with two IRB policies (“Research with Subjects Likely to Manifest or Develop Decreased Decisional Ability” and “Legally Authorized Representatives: Who Can Consent on Behalf of an Adult Subject with Decreased Decisional Ability”) and address those requirements in your IRB application.

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* **Employees including faculty, staff, residents or fellows**
* **MCW students** 
  + Subjects in these categories are not automatically considered to be “vulnerable subjects,” but – depending on the study design and the recruitment plan – the IRB may deem them to be vulnerable, and thus in need of additional safeguards. You should propose safeguards tailored to your project for the IRB to consider.
  + You must be familiar with MCW Corporate policy on “Participation as a Research Subject” which applies to all faculty, fellows, students, and exempt and non‐exempt staff who might be recruited as subjects. This policy states that:
  + Participation in research as a subject is entirely voluntary; participation may not be framed as part of job description or within the scope of a work assignment.
  + Participation in research as a subject should not take place during regular work hours.
  + When some subjects will have a primary reporting or evaluative relationship with the investigator or study team members, the investigator should propose safeguards to minimize undue influence or coercion.
  + If MCW medical students are the focus of the research, the investigator must document permission from the Associate Dean for Student Affairs by uploading the support letter in Section 52.
  + If MCW graduate students are the focus of the research, the investigator must document permission from the Dean of the Graduate School by uploading the support letter in Section 52.

* + If MCW residents or fellows are the focus of the research, the investigator must document permission from the Senior Associate Dean for Graduate Medical Education by uploading the support letter in Section 52.

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* **Fetuses or fetal tissue**
* **Neonates** 
  + Research involving fetuses, fetal tissue (including embryonic), placentas and cord blood fall under the jurisdiction of the MCW/FH (rather than the CHW) IRB.
  + Research with these categories of subjects and/or tissues is defined by regulations and IRB policy as “vulnerable subjects.” Additional safeguards are required. You must be familiar with the DHHS safeguard requirements (45 CFR 46 Part B, 201‐207) and you must address these requirements in your IRB application. (section 12C of SmartForm)

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* **Pregnant women** 
  + Subjects in these categories are defined by regulations and IRB policy as “vulnerable subjects.” Additional safeguards are required. You must be familiar with the DHHS safeguard requirements (45 CFR 46 Part B, 201‐207) and you must address these requirements in your IRB application. (section 12C of SmartForm)

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* **Prisoners** 
  + Prisoners are defined by regulations and IRB policy as “vulnerable subjects.” Additional safeguards are required. You must be familiar with the DHHS safeguard requirements (45 CFR 46 Part C, 301­306) and you must address these requirements in your IRB application. (section 12D of SmartForm)

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* **Limited or non‐reader**
* **Visually / hearing impaired**
* If the investigator plans to recruit subjects who understand and can communicate in English but who are illiterate or who have a sensory handicap, you must detail the procedures you will follow for: (a) obtaining valid informed consent, and (b) communicating with subjects during the entire course of the study.
* For illiterate subjects, the investigator should include the following procedures:

* + Identification of a subject advocate who can read and who is prepared to work with the subject and serve as the witness to the consenting process;

* + Three signature lines on the consent form – for the subject (name or mark), for the person obtaining the consent, and for an independent witness to the consent procedure;

* + Provision to the subject of a copy of the signed consent document, in case the subject wants to share the full form with others at any time for help understanding something; and

* + Provision to the subject of a name and phone number for a person they can contact at any time for information or help.

* For blind subjects, the investigator should include the following procedures:

* + The study team member will read the full consent form aloud for the blind person, who can sign if he/she agrees to participate;
  + Three signature lines on the consent form – for the subject, for the person obtaining the consent, and for an independent witness to the consent procedure;
  + Provision to the subject of a copy of the signed consent document, in case the subject wants to share the form with others at any time for help understanding something; and
  + Provision to the subject of a name and phone number for a person they can contact at any time for information or help.

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* **Non-English speaking**
* You must be familiar with the IRB policy [Recruitment and Enrollment of non-English or Limited English-Proficient Subjects](http://www.mcw.edu/hrpp/policiesprocedures.htm). This policy states that if you plan to enroll subjects who are not fluent in English, you must:
  + With the inclusion criteria at 15.1, identify the specific language(s);
  + Submit an English‐and translated‐language version(s) of the informed consent document and all other written materials (brochures, questionnaires, diaries) necessary for the project;
  + Detail the qualifications of the document translator, and be prepared to pay for a back translation if the IRB feels that this check is necessary;
  + Outline the translation credentials or experience of study team members who will elicit informed consent, as well as those who will be available for translation assistance throughout the course of the study; and
  + Identify a name and phone number that non‐English speaking subjects can contact at any time for information or help with the study.

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* **Poor and/or uninsured**

* + The poor and the uninsured are sometimes willing to take unusual risks for payment or compensation, so the IRB will review financial incentives closely. The poor and the uninsured may be (as a group) less educated, so there is greater burden on the study team to ensure that: (i) the consent process and document are clear and simple, and (ii) there are continuing efforts to remind subjects about the voluntary nature of participation.

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* **Terminally ill patients**

* + Subjects in this category are not automatically considered to be “vulnerable subjects,” but – depending on the study design and the recruitment plan – the IRB may deem them to be vulnerable, and thus in need of additional safeguards. You should propose safeguards tailored to your project for the IRB to consider.

**SmartForm Section 14.1 – Biospecimen Collection**

* Key points to remember:
* For each type of biospecimen, just consider what is **normal** and **expected**
* **ONLY** list biospecimens collected for research purposes
* Don’t count exceptions
* DO count the mights, “patient may have a blood draw at visit 5 at discretion of PI”
* For tissue count the actual taking of the sample as “1” tissue sample per visit

Sample:

|  | Type of Biospecimen | Volume/Size per sample | Estimated total # samples per subject | Estimated total # samples for this project |
| --- | --- | --- | --- | --- |
|  | Solid tissue | A <<discard >>sample will be taken from the clinical sample to be used for research.  An <<extra>> sample will be taken from the clinical sample to be used for research. (Please include how much will be taken i.e. 2” biopsy, etc.) | There is a maximum of “**X**” study visits and **“X”** samples can be collected per visit/study, the maximum amount per subject could be “**X**” | We expect to enroll “**X**” subjects, there is a maximum of “**X**” study visits and “**X**” samples can be collected per visit/study, the maximum amount of samples for the entire project could be “**X**”. |
|  | Blood | Estimate the largest amount for each visit of the study. | There is a maximum of “**X**” study visits and “**X**” samples can be collected per visit, the maximum amount per subject could be “**X**” | We expect to enroll “**X**” subjects, there is a maximum of “**X**” study visits and “**X**” samples can be collected per visit, the maximum amount of samples for the entire project could be “**X**”. |

**SmartForm section 16**

This section is for requests of waivers of consent and HIPAA authorization for screening purposes only. **DO NOT** select ‘Yes’ in this section if you will be requesting waivers of consent and HIPAA authorization for the entire research project.

**SmartForm section 38.1**

* **Waiver or alteration of informed consent**
  + Cannot be used for FDA regulated studies
  + Must meet 4 elements (by documentation in section 40) to be granted
  + If requesting an alteration of consent, please upload the documentation that will be provided to subjects in section 52
* **Waiver to document consent**
  + Process of informed consent must still occur using a regular consent or script
  + Must justify that 1 of 2 elements (by documentation in section 41) are met
* **None of the above. This option should only be selected if:**
  + Project is only accessing data/biospecimens from an IRB approved bank
  + You are seeking ‘Exemption’ for the project
  + The project meets 2006 FDA guidance regarding use of discard, de-identified clinical samples in the evaluation of in-vitro diagnostics.

**SmartForm section 39.1**

If it is anticipated that subjects may be **physically unable to sign** their name please describe the process that will be used to obtain and document their consent. A person who is proficient in English and decisional **BUT** is unable to write, can be enrolled in a study.

The consent form should document the method used for communication with the prospective subject and the specific means by which the prospective subject communicated agreement to participate in the study. An impartial third party should witness the entire consent process and sign the consent document. For questions on a subject specific situation, please contact the IRB Office at 414-955-8422.

**SmartForm section 52.1.2**

* Please be sure to use the prefixes of items selected in section 52.1 when uploading study documents
* Other documents that may be relevant to your study, but are not specifically listed in 52.1 include:
  + ICH Investigator checklist
  + Consent template change request decisions