Reliance on an External Institutional Review Board Under the SMART IRB Master Reliance Agreement
(Updated 11/19/2025)

SMART IRB is not an IRB.

SMART IRB is an initiative developed under an award from the National Center for Advancing Translational Sciences ("NCATS") of the National Institute of Health ("NIH") to support single IRB (sIRB) review. SMART IRB includes:

- A master IRB reliance agreement that permits eligible institutions that join it ("Participating Institutions") to cede review of human subjects research to other Participating Institutions' IRBs
- A set of standard operating procedures (SOPs) to guide implementation of the reliance relationship among Participating Institutions
- An optional centralized online system to support sign-on, reliance determinations, and harmonization

UMass Chan is a signatory to SMART IRB.

Click here (https://smartirb.org/participating-institutions/) to see all SMART IRB participating sites, including Advarra and several other independent IRBs.

In order for the UMass Chan IRB to be able to extend this agreement to include a specific research study, all of the following conditions must apply:

The research is phase 2 or higher, or is a phase 1 or first-in-human trial that is managed by the Cancer Research Office..
The IRB at the SMART IRB participating site is willing to review for UMass Chan.
The research does not require a HIPAA waiver, or the reviewing IRB is willing to issue the waiver for UMass Chan.

If you wish to rely on an external IRB that is part of SMART IRB and your study meets the criteria above, follow the approval process outlined below.

Research studies that do not meet the criteria above, including phase I or first-in-human trials that are not managed by the Cancer Research Office, will be considered by the UMass Chan IRB on a case-by-case basis.

To initiate a request, email IRBreliance@umassmed.edu with a copy of the protocol, master consent, name of the UMass Chan PI, a description of how UMass Chan will be involved, and the name of the reviewing IRB. In addition, requests should include:

- A description of the investigational product, including how it is administered and its risks
- Proposed staffing and their experience with clinical research and Phase I trials
- The setting in which research procedures will occur
- Safety measures, including the plan for coordinating care for subjects in the absence of a 24-hour inpatient clinical trials unit. For example, explain which service subjects would be admitted to and how care will be coordinated and communicated between the clinical team and the study team.

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Approval Process

If the study meets the criteria above or the UMass Chan IRB has agreed to cede review to the external IRB:

In RMS eIRB:

- Initiate a multi-site relying study (Job Aid may be found HERE) and select the reviewing institution as the external IRB.
    - Use the percent symbol (%) to search for the name of the reviewing IRB
    - If you cannot find the institution, contact IRBreliance@umassmed.edu with a copy of the protocol, master consent, name of the UMass Chan PI, a description of how UMass Chan will be involved, and the name of the reviewing IRB. Explain that you are seeking to rely on the reviewing IRB through SMART IRB and are requesting that the reviewing IRB be added in RMS eIRB.
- Verify that all study staff have completed CITI human subjects training, conflict of interest training, and if a clinical trial, GCP training.
- Upload the following Study-Wide Documents
    - IRB approved master protocol
    - Most current IRB approval letter for study
    - And as applicable
        - Investigator brochure
        - IRB approved consent form template
- Upload the following Local Study Documents
    - Completed UMass Chan HRP-508 pSite Supplement and Communication Plan or comparable document from the reviewing IRB
    - Any documents required by the reviewing IRB that require local HRPP/IRB review
    - Any other required UMass Chan approvals, which must be obtained before submitting to the reviewing IRB, e.g.,
        - IBC registration or an explanation in the pSite form as to why IBC registration is not required
        - RSC approval or a copy of the *Questions for PI* documenting why RSC approval is not required
        - COI approval and mitigation plan
    - And as applicable:
        - Red-line copies of site-specific materials based on the IRB-approved templates (e.g., draft consent form for use at UMass Chan)
        - UMass Chan HIPAA Research Authorization Form unless using a compound consent and authorization

- The UMass Chan IRB does not need a copy of every study document approved by the reviewing IRB.
- The UMass Chan IRB does need to know how the reliance will be documented:
    - For independent IRBs such as Advarra, UMass Chan requires the use of the SMART IRB Online Reliance System
    - Most academic IRBs will provide their required templates; if there is none, ask the UMass Chan IRB for its template *Letter of Acknowledgment and Selection of Terms that are Flexible under the SMART IRB Agreement*
    - If the SMART IRB reliance for a specific study will be documented in the SMART IRB Online Reliance System, a member of the UMass Chan study team will need a user account. Visit https://smartirb.org/reliance/ to request investigator access. Negotiate with the lead site who will initiate the reliance request in the system.

Once all required documents have been uploaded into RMS eIRB, the PI has submitted the study, and the submission is in Pre-Review (and is no longer in Pre-Submission), the UMass Chan IRB will conduct a local context review which includes the following activities:

- Confirming that the PI is not restricted as per the Investigator's Manual
- Reviewing the list of active study staff for current CITI human subjects research training
- Reviewing the uploaded documents to assure that the study meets the conditions of the reliance agreement and local requirements
- Notifying the study team of any issues, including required changes to the consent form, through Pre-Review Clarifications Requested in eIRB
- Sending confirmation (via Add Comment) to the study team indicating that the application may be submitted to the reviewing IRB

Once the reviewing IRB has approved the study, the study team uploads the IRB site approval letter and the final approved site-specific documents to Local Study Documents in RMS eIRB. The PI then submits the response.

Once the UMass Chan IRB verifies that the approved documents match the ones that were cleared for submission, it will acknowledge receipt.

PI POST-IRB APPROVAL RESPONSIBILITIES:

Once IRB approval is granted, the reviewing IRB will maintain oversight of the study. Therefore, subsequent submissions (e.g., amendments, continuing reviews, reportable events) go directly to the reviewing IRB for review. However, the annual continuing review and other items listed below must also be submitted to UMass Chan IRB through RMS eIRB.

Information to Also Submit to UMass Chan IRB	RMS eIRB Function
All changes in study staff, including changes in PI	Create Site Modification
Proposed changes to research injury compensation language or conflict of interest declarations	Create Site Modification

Unanticipated problems involving risks to subjects or others, reports of serious and/or continuing non-compliance, or IRB suspension or termination through RMS eIRB – when the information involves a UMass Chan subject or investigator	Report New Information
Notification of reapproval plus current site-specific materials, study-wide protocol, and IB if not already in RMS	Create Site Modification to upload current site-specific materials (e.g., consents)
	Update Study Materials to upload IRB study reapproval letter and current study-wide protocol and IB
Closure of the study or UMass Chan as a site	Update Study Materials to upload closure letter

GENERAL TIPS

- Make sure you are working from the most recent instructions and from IRB approved templates.
- Read through the instructions in full before starting and prepare your materials offline.
- Make sure all study staff have completed the required human subjects, GCP, and COI CITI trainings.
- Make sure all ancillary reviews are complete.
- See eIRB Course 4: Multi-Site Relying Study Submission Process.

ADMINISTRATIVE REVIEW AND CONSENT FORM TIPS

- **Use the UMass Chan research injury language from the UMass Chan consent form template.**
  - The UMass Chan boilerplate is consistent with the clinical trial agreement and the requirements of the Contracting Guide. The Contracting Guide is shared early in the contract process with the sponsor. The guide includes a Subject Injury Coverage Statement that outlines prohibited language. Study teams should only submit for administrative review redline consents that use the UMass Chan research injury language.
- If the consent includes references to the European Economic Area's General Data Protection Regulation (GDPR), obtain administrative review from privacyandcompliance@umassmed.edu before submitting the draft in RMS eIRB. If you see references to data controllers or local data protection

authorities in Europe, the consent likely requires review by Privacy and Compliance.

- All research happens under the auspices of the Medical School.
    - Ensure that the informed consent conveys that UMass Chan Medical is conducting the research. When research at UMass Chan happens in a clinical setting, subjects may be seen at, e.g., UMass Memorial Medical Center.
    - When the consent or authorization discusses disclosure of protected health information, it must cite as applicable UMass Memorial Medical Center or UMass Memorial Health as the covered entities that hold the protected health information.
    - If the UMass Memorial logo appears, the UMass Chan logo must also be present.
- Remove any language in which subjects give up rights or ownership of samples or information collected about them.
    - The clinical trial agreement provides the sponsor a right of use, not ownership.
    - The consent can inform subjects that they will have no rights related to discoveries made as part of the research and that they will not share in any profits.
- Ensure that the consent does not overpromise coverage of possible related expenses. The following UMass Chan boilerplate is suggested for clinical research consents when the consent does not have similar language.
    - *You or your insurance will not have to pay for tests and procedures that are done for research purposes only. However, you or your insurance will be billed for all routine medical and diagnostic costs that are part of the standard of care for treating your condition. This may include the cost of tests, procedures, or medicines to manage any side effects. You will be responsible for any deductibles, co-payments, or co-insurance payments that your coverage normally requires.*

      <u>Drug name or agent</u> will be provided to you at no cost; however, you or your insurance may be billed for the administration of this drug or agent.
- Do not overpromise confidentiality.
    - There are many groups at UMass Chan and UMMH that will necessarily have appropriate access to identifiable information about subjects, including through OnCore and EPIC.
    - The consent may not permit subjects to opt out of the study doctor notifying a subject's regular doctors about the subject's participation in the research. Due to safety concerns, UMass Chan

	does not permit these opt-outs. Study teams may remove or revise these opt-outs. • When a HIPAA authorization is necessary, the consent must include a complete HIPAA authorization, or the study team can add a UMass Chan stand-alone HIPAA authorization. See *HRP-330 – WORKSHEET – HIPAA Authorization* to evaluate whether a consent is a compound consent and authorization. • A HIPAA authorization must permit disclosure to UMass Chan and UMMH. The following UMass Chan boilerplate is suggested when the consent does not have similar language. ○ *The UMass Chan Medical School and UMass Memorial Health, including their Institutional Review Board (IRB) and research, billing, and compliance offices* • Consents must provide a 24-hour contact number for studies that are greater than minimal risk • If the research includes pregnancy testing of minors, add the corresponding language from the UMass Chan consent template: ○ *If you could get pregnant, you will have pregnancy testing as part of this study. Only you will be told the results. If you are a minor and are found to be pregnant, we will talk to you about getting appropriate healthcare and the support of an adult. A positive pregnancy test means that you cannot be in this study. Because you will be asked to leave the study, your parents may find out that you are pregnant. If you are uncomfortable with pregnancy testing, then you should not be in this study.*

For IRB Office Use Only

Document Version History:

Date	Status
02/10/2022	Initial Post
04/06/2022	Addition of Example of WCG IRB Multi-site Relying Study in RMS eIRB - Model for File Management
07/13/2022	Minor revisions
10/11/2022	Revised to update study/site closure process
11/19/2025	Permit use of external IRB for phase 1 and first-in-human trials that are managed by the

	Cancer Research Office; re-described administrative review as local context review; updated links