HRP-832 | 11/2/2023

WORKSHEET: Considerations for Ceding IRB Review

The purpose of this worksheet is to provide considerations that the institution may evaluate when considering requests to outsource review to a commercial IRB or to require a pSite’s IRB to serve as sIRB.[[1]](#endnote-2)

1. General exclusion Criteria

The following are circumstances in which the institution will not cede IRB review.

The institution does not maintain an OHRP-approved Federalwide Assurance (FWA).

The institution is not engaged in the research activities.

The study is determined to not involve Human Research.

The study is determined to be Exempt.

1. Considerations to Cede IRB Review to Commercial IRBs

The institution will evaluate on a case-by-case basis ceding IRB review. The following characteristics of the study will be evaluated to determine whether to cede IRB review to a Commercial IRB (e.g., Advarra, WIRB, etc.). (At least one of the following considerations should be true)

The project is commercially sponsored research.

The institution’s IRB lacks sufficient expertise to conduct the IRB review.

The institution is the lead site of a multi-site project and the IRB lacks sufficient resources to provide oversight of the project.

Other relevant considerations: Click or tap here to enter text.

1. GENERAL CONSIDERATIONS FOR CEDING IRB REVIEW TO OTHER (NON-COMMERCIAL) IRBs

The following are additional considerations for evaluating the institution’s willingness to cede IRB Review to an institution with a valid OHRP-approved Federalwide Assurance (FWA). (At least one of the following considerations should be true)

Ceding IRB review is mandatory or optional

Comments: Click or tap here to enter text.

The reviewing IRB has sufficient expertise and experience reviewing and overseeing research of similar nature to the proposed study.

Comments: Click or tap here to enter text.

The reviewing IRB has sufficient expertise with certain features of the protocol or the participant population that may pose special concerns. (e.g., recruitment of socially or economically disenfranchised populations, local cultural mores or unique clinical circumstances)

Comments: Click or tap here to enter text.

Whether ceding IRB review could create or mitigate unique institutional risks, such as conflicts of interest.

Comments: Click or tap here to enter text.

The financial implications of the decision—this includes:

a) analysis of lost research opportunities (i.e., unwillingness of a sponsor or funder to allow local, non-ceded IRB review);

b) the additional administrative time and costs associated with establishing authorization agreements.

Comments: Click or tap here to enter text.

Resources needed by the study team to learn and adhere to the policies and procedures of the reviewing IRB.

Comments: Click or tap here to enter text.

1. This document satisfies AAHRPP element I-9 [↑](#endnote-ref-2)