CIRB review for collaborative research studies between Duke-NUS and SingHealth Institutions

Frequently Asked Questions

With effect from 1 April 2020, Duke-NUS Medical School ("Duke-NUS") researchers may submit their research applications to SingHealth CIRB for ethics review.

1. What type of Duke-NUS studies are eligible for CIRB review?

Duke-NUS research studies which will be conducted in collaboration with SingHealth Institution(s) as part of a multi-site study led by a Principal Investigator from Duke-NUS or from any SingHealth Institutions, are eligible for CIRB review.

This applies to new applications submitted to CIRB (via the iSHaRe e-CIRB) on and after 1 April 2020.

2. What type of Duke-NUS studies are not eligible for CIRB review?

All existing CIRB-approved research studies conducted as part of the Duke-NUS and SingHealth collaboration will continue to be reviewed by CIRB, which only SingHealth institutions are under the purview of CIRB.

Note: The SingHealth Principal Investigator should not submit study amendment to add Duke-NUS as a new study site.

In additions, the following Duke-NUS studies are not eligible for CIRB review:

Example 1:
SingHealth physicians refer patients for recruitment by Duke-NUS study team. All the research activities including informed consent will be carried out at Duke-NUS.

Note: For purposes of CIRB review, this is not a collaborative research. SingHealth is only a referral site, not a study site. Such studies must be sent to NUS-IRB for review.

Example 2:
SingHealth physicians contribute domain expertise in design of the research study, refer patients for recruitment by Duke-NUS study team and provide input/advice to the research data. Recruitment posters will be placed at SingHealth institutions. All other research activities including informed consent will be carried out at Duke-NUS.

Note: For purposes of CIRB review, this is not a collaborative research. While the SingHealth physicians may be part of the study team of this Duke-NUS research, no research is being conducted at SingHealth. SingHealth is only a referral site, not a study site. For advertisement at SingHealth, the Duke-NUS study team should go through the SingHealth Group Communications. Such studies must be sent to NUS-IRB for review.

Example 3:
Duke-NUS researchers conduct research involving analysis of anonymised data or de-identified data obtained from SingHealth researchers.

Note: For purposes of CIRB review, this is not a human subject research. Such studies must be sent to NUS-IRB for review. Where required, data sharing arrangement or agreement between Duke-NUS and SingHealth should be put in place.

3. Who should be the Overall Principal Investigator (PI)?

SingHealth Principal Investigator and Duke-NUS Principal Investigator shall discuss and agree on the Overall PI. The Overall PI will be the contact person for CIRB and shall be responsible for the conduct of all the research activities.

4. How the CIRB application should be submitted?

CIRB application should be submitted online via the iSHaRe e-CIRB portal.

Refer to "e-CIRB User Guidebook: New Application" available on CIRB website.

Duke-NUS researchers are encouraged to visit the CIRB website for the submission requirements and reporting timeline.

5. Who should be listed as part of the study team in CIRB application?

The Principal Investigator and/or Site-Principal Investigator should determine whether the study personnel meets the definition of study team (Co-investigator, Study Team Member).

The study team should only carry out research-related activities upon obtaining written approval from CIRB.

- Co-investigators - An individual of the research/ clinical trial team designated by the Principal Investigator to perform study-related procedure and/or make important research-related decisions.

- Study Team Members - An individual who is directly involved in a research study.

- All personnel who have a responsibility for the consent process and/or direct data collection for the study must be listed as part of the study team (Co-investigator or Study Team Member).

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6. Who need not be listed as part of the study team in CIRB application?

The following individual need not be listed as study team:

- Individual's whose role in the research study is part of his/ her regular duties (i.e. radiographer, imaging technologist) and his/her involvement in the study is limited to performing those duties without contributing to the study goal.

- External Collaborator(s) who are not involved in the conduct of the research at the SingHealth and Duke-NUS research sites. Roles and responsibilities of these collaborators should be addressed through an agreement instead, e.g. Material Transfer Agreements (MTA).

- Overseas Collaborator(s) who are involved in analysis of de-identified data.

7. Does the study team need to create an account to access iSHaRe e-CIRB?

Yes. Duke-NUS researchers who meet the definition of study team (see FAQ 5 and FAQ 6) are required to set up an iSHaRe account via the iSHaRe homepage.

Duke-NUS study team should be listed on Section B2 of the CIRB application using their registered iSHaRe e-CIRB accounts. This will allow them to view their CIRB applications, download study-related documents such as approval letters and receive communications from SingHealth CIRB.

Refer to User Guidebook: iSHaRe Account Registration - *Section 2.2 iSHaRe Account Set-up- External Use* for step-by-step guide.

8. What are the training requirements for SingHealth study team?

Principal Investigator, Site Principal Investigator, Co-Investigator and Study Team Member from SingHealth are required to complete the CITI Program for Biomedical Research Investigators and Key Personnel programme or minimally the 11 CITI core modules (see Table 1).

Principal Investigator and Site Principal Investigator conducting clinical trials from SingHealth are required to complete local Good Clinical Practice Program (offered by SingHealth Academy, National Healthcare Group, National University Health System or National University of Singapore) in addition to the required CITI Program.

Table 1: Minimum CITI training requirement for SingHealth study team

Study Roles	Training
Everyone in the study team, including: ● Principal Investigator ● Site Principal Investigator ● Co-Investigator ● Study Team Member	Collaborative Institutional Training Initiative (CITI) – ➢ **Biomedical Research Investigators and Key Personnel program**; OR ➢ **CITI program with these 11 core modules:** 1. Belmont Report and CITI Course Introduction 2. History and Ethics of Human Research 3. Informed Consent 4. Social and Behavioral Research (SBR) for Biomedical Researchers 5. Records-Based Research 6. Genetic Research in Human Populations 7. Populations in Research Requiring Additional Considerations and/or Protections 8. Vulnerable Subjects - Research Involving Prisoners 9. Vulnerable Subjects - Research Involving Children 10. Vulnerable Subjects - Research Involving Pregnant Women, Human Fetuses, and Neonates 11. Conflicts of Interest in Research Involving Human Subjects

9. What are the training requirements for Duke-NUS study team?

Principal Investigator, Site Principal Investigator, Co-Investigator and Study Team Member from Duke-NUS are required to complete the CITI Program according to NUS requirement – 'Biomedical Research' (Basic and/or Refresher course). See Table 2 for a list of the modules.

Principal Investigator and Site Principal Investigator from Duke-NUS conducting clinical trials are required to complete local Good Clinical Practice Program (offered by SingHealth Academy, National Healthcare Group, National University Health System or National University of Singapore) in addition to the required CITI Program.

Table 2: Minimum CITI training requirement for Duke-NUS study team

Study Roles	Training
Everyone in the study team, including: ● Principal Investigator ● Site Principal Investigator ● Co-Investigator ● Study Team Member	Collaborative Institutional Training Initiative (CITI) – ➢ **Biomedical Research:** 1. Belmont Report and Its Principles 2. Avoiding Group Harms-U.S. Research Perspectives 3. Populations in Research Requiring Additional Considerations and/or Protections 4. History and Ethics of Human Research 5. Basic Institutional Review Board (IRB) regulations and Review Process 6. Informed Consent 7. Social and Behavioral Research (SBR) for Biomedical Researchers 8. Records-Based Research 9. Genetic Research in Human Populations 10. Research Involving Prisoners 11. Research Involving Children 12. Research Involving Pregnant Women, Human Fetuses, and Neonates 13. International Studies 14. FDA-Regulated Research 15. Research and HIPAA Privacy Protections 16. Vulnerable Subjects-research involving workers/employees 17. Conflict of interest in Human Subjects Research

10. How should the research activities be detailed in CIRB application?

All research activities that will be carried out as part of the research study should be clearly described in the CIRB application (Section F10) with the following details:

- WHAT are the research activities that will be carried out?
- WHO will be carrying out each of these research activities?*
- WHERE these research activities will be carried out?
- WHEN these research activities will be carried out?
- HOW these research activities will be carried out?

*It is only required to state the institution's name, not names of the individuals.

Example: SingHealth study team will conduct informed consent discussion with the potential participants and extract clinical information from medical records. Duke-NUS study team will conduct in-depth interview with the participants.

It is important to note that responses to Section F10 should be different from Section F8. Unlike Section F10 which details all activities that will be carried out as part of research in the study, Section F8 should only describe the experimental design and procedures to be used to accomplish the specific aims of the research study.

11. How should the researcher and/or the institution's research development office (RDO) check for completeness of the CIRB application?

Refer to *CIRB Initial Application Checklist* on CIRB website. This document serves to facilitate the study team and the RDO in preparing the CIRB application.

12. The Informed Consent templates from SingHealth CIRB and NUS are different. Which templates should be used?

Each recruiting study site should use its own Informed Consent templates.

The SingHealth CIRB Informed Consent Form template (available on CIRB website) should be used for SingHealth site.

The NUS Informed Consent Form template (available on NUS-IRB website) should be used for Duke-NUS site.

13. Researchers are required to report Serious Adverse Events (SAEs) to CIRB. Is there any difference in reporting timeline for SingHealth and Duke-NUS study sites?

For SingHealth study site, report SAEs according to the *Reporting Requirement and Timeline for SAE* on CIRB website.

For Duke-NUS study site, report SAEs as soon as possible and within 1 working day. Refer to RCIO Policy Appendix 2C SAE and SOC Reporting Guidelines.

14. Researchers are required to report Protocol Deviation/Non-Compliance (PD/NC) to CIRB. Is there any difference in reporting timeline for SingHealth and Duke-NUS study sites?

For SingHealth study site, report PD/NC once the Principal Investigator/ Site Principal Investigator is aware of the incident but no more than 14 calendar days.

For Duke-NUS study site, report PD/NC as soon as possible and within 1 working day. Refer to RCIO Policy Appendix 2C SAE and SOC Reporting Guidelines.

If the respective Research Institutions (RIs) assess that the reported PD/NC is a suspected offence of contravention (SOC), the RI will submit SOC reporting to MOH accordingly.

15. How long should research data be kept?

For Clinical Trials:
According to *ICH GCP E6 (R2)*, the essential documents should be retained until:

- at least 2 years after the last approval of a marketing application in an ICH region and until there are no pending or contemplated marketing applications in an ICH region; or
- at least 2 years have lapsed since the formal discontinuation of clinical development of the investigational product;
- These documents should be retained for a longer period if required by the applicable regulatory requirements or by an agreement with the sponsor.

Essential documents are documents which individually and collectively permit evaluation of the conduct of a study and the quality of the data produced. For a list of the essential documents required to be maintained for the conduct of a clinical trial, refer to sections 8.2, 8.3 and 8.4 of the ICH GCP E6 (R2).

For Other Research Studies:
SingHealth study site

- According to the *SHS-RSH-OOR-CWP-202 SingHealth Cluster Research Data Management Policy – General Policy*, research data should be retained in a secured storage facility for a minimum of 7 years after completion of research study (as per Information Classification & Document Management policy) calculated from the date of completion of study or date of publication of the research using the research data, whichever is later.

Duke-NUS study site

- Research data should be retained for a minimum period of 10 years after study completion or for 3 years after publication, whichever is later.