| UC San Diego                                 | OIA-021 SOP: Pre-Review |            |          |              |        |  |  |
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## 1 PURPOSE

- 1.1 This procedure establishes the process to pre-review requests for approval or determination regarding:
  - 1.1.1 New <u>research/expanded access</u>/humanitarian use device (HUD)
  - 1.1.2 Continuing review of research/expanded access/HUD
  - 1.1.3 Modification to previously approved <u>research/expanded access</u>/HUD
  - 1.1.4 Study closure
  - 1.1.5 Response to an approved pending determination
  - 1.1.6 Response to a deferral
  - 1.1.7 Whether an activity is not <u>human research</u>, is exempt <u>human research</u>, or is <u>human</u> <u>research</u> that does not engage the institution.
- 1.2 The process begins when the Office of IRB Administration (OIA) receives a request for approval.
- 1.3 The process ends when the information has been placed on the agenda for an IRB or Stem Cell Research Oversight (SCRO) meeting, will be handled by <u>non-committee review</u>, or will be handled by <u>administrative review</u>.

## 2 REVISIONS FROM PREVIOUS VERSION

2.1 None

## 3 GUIDANCE

3.1 For single IRB (sIRB) protocols, the addition of a participating site to a previously approved protocol is considered a modification to previously approved <u>research</u>.

### **4 RESPONSIBILITIES**

4.1 OIA staff members carry out these procedures.

### 5 PROCEDURE

- 5.1 If the request indicates that review by the SCRO committee is required, assign the submission to the SCRO analyst. SCRO analyst follows *OIA-022 SOP: SCRO Pre-Review*.
- 5.2 Use *OIA-301 WORKSHEET: Review Materials*, or equivalent, to determine if the submission is complete.
- 5.3 Consider whether the investigator needs to be contacted.
  - 5.3.1 Communicate with the investigator if any of the following are true:
    - 5.3.1.1 The investigator has requested study closure and the study does not meet closure criteria.
    - 5.3.1.2 The request is for an initial approval and principal investigator is <u>restricted</u>.
    - 5.3.1.3 The type of <u>research</u> is not conducted or overseen by the institution.
    - 5.3.1.4 The type of <u>research</u> is reviewed by an external IRB.
    - 5.3.1.5 Submitted information is incomplete.
    - 5.3.1.6 Study has been expired longer than one year and continuing review is requested.
  - 5.3.2 Explain the issue and offer the investigator the opportunity to withdraw or correct the submission.
  - 5.3.3 If the investigator withdraws the submission, stop processing.
  - 5.3.4 If the investigator will not withdraw or correct the submission, assign the submission to the committee analyst and/or committee support analyst who may place the submission on the agenda for a convened IRB meeting in an IRB with appropriate scope.
- 5.4 If the submission is a response to an IRB approved pending determination that was not required to undergo convened IRB review, assign to the committee analyst and/or committee support analyst for the IRB that reviewed and issued the approved pending determination. The committee analyst and/or committee support analyst will:
  - 5.4.1 Evaluate whether the investigator made the required modifications.
    - 5.4.1.1 If the IRB requested additional documents to be submitted, evaluate whether the additional documents indicate new issues for the IRB to consider [e.g., a previous clinical hold imposed by the Food and Drug Administration (FDA), which may indicate additional risks].
    - 5.4.1.2 If new issues are not indicated by the documents, proceed to Section 5.4.2.

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- 5.4.1.3 If new issues are indicated by the documents, proceed to Section 5.6.
- 5.4.2 If the investigator made the required modifications and did not make unrequested modification(s), follow *OIA-052 SOP: Post-Review* to issue an approval.
- 5.4.3 If the investigator did not make the required modification(s) and/or made unrequested modifications, follow Section 5.6.
- 5.5 If the request is a submission for IRB study closure or a continuing review that meets closure criteria, perform the following steps:
  - 5.5.1 Confirm all research activities and all identifiable data analysis are complete.
  - 5.5.2 If reportable events are indicated or included in the submission, follow OIA-024 SOP: Reportable Events.
  - 5.5.3 If the submission is missing information, contact the investigator.
  - 5.5.4 Once the submission is complete, close the study and send OIA-511 TEMPLATE LETTER: Acknowledgment of Research Closure, or equivalent.
- 5.6 Evaluate the most likely level of IRB review:
  - 5.6.1 If the <u>research</u> appears to meet the requirements for a determination of not <u>human subjects</u> <u>research</u> (NHSR), assign to an OIA staff member who may follow *OIA-310 WORKSHEET: Human Research Determination*, or equivalent, to complete the <u>administrative review</u>. OIA staff members may use *OIA-401 CHECKLIST: Pre-Review*, or equivalent, and *OIA-402 CHECKLIST: Non-Committee Review*, or equivalent, to document their determinations.
  - 5.6.2 If the <u>research</u> is <u>human research</u> but UCSD or another site relying on UCSD's IRB is not engaged, assign to an OIA staff member who may follow *OIA-311 WORKSHEET: Engagement Determination*, or equivalent, to complete <u>administrative review</u>. OIA staff members may use *OIA-401 CHECKLIST: Pre-Review*, or equivalent, and *OIA-402 CHECKLIST: Non-Committee Review*, or equivalent, to document their determinations.
  - 5.6.3 If the <u>research</u> appears to meet the requirements for an exemption and the investigator is not <u>restricted</u>, assign to an OIA staff member who may follow *OIA-312 WORKSHEET: Exemption Determination*, or equivalent, to complete the <u>administrative review</u>. OIA staff members may use *OIA-401 CHECKLIST: Pre-Review*, or equivalent, and *OIA-402 CHECKLIST: Non-Committee Review*, or equivalent, to document their determinations.
  - 5.6.4 If the request can be handled as a <u>non-committee review</u> and the principal investigator is not <u>restricted</u>, follow *OIA-031 SOP: Non-Committee Review Preparation*.
  - 5.6.5 If the request requires review by a convened IRB and the principal investigator is not <u>restricted</u>, assign the submission to the appropriate analyst working with the relevant IRB in the electronic submission system and follow *OIA-040 SOP: IRB Meeting Preparation*.
  - 5.6.6 If the request involves an investigator who would not correct or withdraw a submission, or the submission otherwise cannot be handled as a <u>non-committee review</u>, assign the submission to the committee analyst and/or committee support analyst who may place the submission on the agenda for a convened IRB meeting in an IRB with appropriate scope.

#### 6 MATERIALS

- 6.1 OIA-001 SOP: Definitions
- 6.2 OIA-022 SOP: SCRO Pre-Review
- 6.3 OIA-024 SOP: Reportable Events
- 6.4 OIA-031 SOP: Non-Committee Review Preparation
- 6.5 OIA-040 SOP: IRB Meeting Preparation
- 6.6 OIA-052 SOP: Post-Review
- 6.7 OIA-301 WORKSHEET: Review Materials
- 6.8 OIA-310 WORKSHEET: Human Research Determination
- 6.9 OIA-311 WORKSHEET: Engagement Determination
- 6.10 OIA-312 WORKSHEET: Exemption Determination
- 6.11 OIA-401 CHECKLIST: Pre-Review
- 6.12 OIA-402 CHECKLIST: Non-Committee Review

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6.13 OIA-511 TEMPLATE LETTER: Acknowledgment of Research Closure

# 7 REFERENCES

7.1 None