



**Walter Reed Army Institute of Research
Standard Operating Procedure**



SOP Title	REVIEW OF HUMAN SUBJECTS RESEARCH BY THE FULLY CONVENED WRAIR INSTITUTIONAL REVIEW BOARD	SOP No.	UWS-HP- 628.02 (Appendix A)
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APPENDIX A

WRAIR IRB PROTOCOL WORKSHEET

1. Objectives, Background, and Significance

- Are the objectives clearly described?
- Does it appear that there is adequate preliminary data to justify the research?
- Does it appear that there is appropriate justification for this research protocol?
- Is the Principal Investigator(s) qualified by experience, training, etc.?
- Are there any notable conflicts of interest (Monetary, Intellectual Property (IP), etc.)?
- Was scientific review approval achieved? If yes, did the scientific review committee (SRC) identify any issues? Did the study team adequately address the SRC concerns?

2. U.S. Food and Drug Administration (FDA)/European Medicines Agency (EMA)/Environmental Protection Agency (EPA) - Regulated Research

- Is the regulatory status of the drug, device or biologic described and appropriate?
- Are the dose and route of administration appropriate?
- Request current status of the submission to the U.S. FDA/EMA.
- Documentation that the U.S. FDA has issued an Investigational New Drug (IND) Application, Investigational Device Exemption (IDE), etc. to proceed with the study(s).
- Are the safety and efficacy data for the drug, device or biologic sufficient to warrant the proposed phase of testing?
- Is the risk status of the device (significant risk or non-significant risk), as used in this study, described and appropriate? Does the reviewer agree with the designation?
- Does the protocol describe acceptable accountability, storage, access, and control of the drug or device?
- Is the Investigator Brochure (IB)/Device Manual current?
- Are there adequate provisions for monitoring the data (Data Safety Monitoring Board [DSMB]/Plan)? Is the charter included?

3. Study Design



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- Does the study design appear to be adequate to meet the objectives?
- Are the objectives likely to be achieved in the specified time period?
- Does it appear that the study design is adequately described and justified?
- Are there appropriate resources (e.g. equipment, space, funding, staff) to conduct this study safely?
- Are staggered enrollments/administration of products appropriate?

4. Study Procedures

- Are study procedures adequately described and acceptable?
- Are research and non-research (e.g. clinical, established effective treatment) procedures clearly differentiated?
- Are there adequate plans to inform participants about specific research results that could affect the participant’s health and/or decision to continue participation?

5. Enrollment Criteria

- Is subject selection equitable?
- Are inclusion and exclusion criteria clearly stated and reasonable?
- Are special classes of participants, especially populations deemed vulnerable (e.g. women (pregnant or of childbearing potential), children) included in the research? Is the inclusion or exclusion of special populations justified?
- If applicable, are pregnancy testing and contraceptive practices adequately addressed?

6. Data Analysis, Data Monitoring, & Data Safety

- Does it appear that the rationale for the proposed number of subjects is clearly stated and reasonable? Does it appear that formal sample size calculations were done and are they available for review?
- Are the plans for data analysis described and justified, including the use of stopping rules and endpoints, as they relate to human subjects protection?
- Are there adequate provisions for monitoring the data (DSMB/Plan)? Is the charter included? Will the Institutional Review Board (IRB) receive “regular” reports from the DSMB/ Data Monitoring Committee (DMC)?
- Are adverse event and unanticipated problems reporting addressed?



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7. Subject Privacy and Confidentiality

- Are provisions to protect the privacy and ensure the confidentiality of research participants clearly described and adequate?
- Are plans and provisions to protect the confidentiality of data/specimens during and after the study described and adequate? (Who will have access, what will be stored, how long, any sharing, & where will data/specimens be stored/located?)
- Is use of identifiers or links to identifiers justified and how is this information protected? Are these measures adequate?
- Are measures for disposition/management of data/documents/specimens adequate?

8. Recruitment

- Are the methods for recruiting volunteers adequately described and appropriate? (Have all flyers, briefing slides, PowerPoint Presentations, etc. been provided?)
- Are the amount and type of payment or reimbursement adequately described and do they have a potential to cause undue influence? Is the total amount on flyer? Is this appropriate given the study population?
- Are the location and timing of recruitment activities acceptable?
- Are the individuals conducting recruitment activities appropriate?
- If applicable, are acceptable methods in place for screening participants before recruitment (e.g. mailings, medical records review)?

9. Subject Payment/Reimbursement and Costs

- Is the amount and type of payment or reimbursement clearly described, appropriate, and does not appear to have potential for undue influence?
- If study participation involves out of pocket expenses and/or cost to the participant if insurance denies payment, is this expense justified and clearly explained in the consent form?
- Are participants unduly influenced to accept increased cost?
- Do incentives have the potential to cause undue influence (examples: bonuses, referral payment)
- If the payment/reimbursement is located on the recruitment material, is it positioned and sized so it is not a center of focus, nor does it have the appearance or potential for undue influence?



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10. Potential Risks/Discomforts and Benefits for Subjects

- Are the risks (relative to non-research alternative) and benefits (direct for the subject versus altruism) clearly identified and described?
- Risk: Benefit Ratio Analysis: Do the benefits to be gained justify the risks? Does the knowledge to be gained justify the risks?
- Have potential risks been minimized as much as possible by:
 - (a) Using procedures consistent with sound study design (e.g. appropriate control group),
 - (b) Using procedures that do not necessarily expose subjects to risk, and
 - (c) Using procedures already being done on subjects for diagnostic/treatment purposes?
- What risk designation should the study be given (minimal risk versus greater than minimal risk)?
- Is there intent to benefit vulnerable participants (e.g. children)?
- Are special protections in place for vulnerable participants?
- Has the investigator described an appropriate plan for monitoring participants during and after the research? If applicable, will counseling, referrals, or other support services be provided?
- Greater than Minimal Risk (GTMR) Studies Only (where the Principal Investigator [PI] is a U.S. Army Medical Research and Development Command (USAMRDC) employee or the site is a USAMRDC laboratory) - Has the medical care for research related injury been addressed in the protocol and consent?

11. Informed Consent/Assent

- Is the informed consent process adequately described?
- Does the consent form comply with the Common Rule with required notification of key information and other CR provisions listed upfront?
- Does the process provide sufficient privacy, time and an adequate setting for the subject to consider participation?
- Does the process minimize the possibility of coercion or undue influence?
- Is the appropriate individual obtaining informed consent/assent?
- Does the informed consent document contain the required elements (see WRAIR IRB Consent Form Checklist, Appendix D)?
- Does the information in the consent form match what is in the protocol?
- Is the consent form likely to be understood by the expected subject population?
- Are future uses of data/specimens addressed (example: genetic testing)?

Source: Institutional Review Board Member Handbook, Amdur



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- Does the consent form include GINA language, if appropriate?
- Will photographs, video, or audio recordings be made?
- Is population literate? If not, what are provisions?
- Are subjects incapacitated? If yes, who are appropriate legally authorized representatives/surrogates?
- Is assent required? If so, is a separate assent form required?
- For parental consent, does the protocol describe:
 - (a) The age of majority for the minor population,
 - (b) What will happen if the parents consent and the child disagrees,
 - (c) Whether the signature of one or both parents is required if the subject is unable to consent.
- If the information that is given to the subject or the representative does not appear to be in language understandable to the subject or the representative, has a test of comprehension been provided?

12. Waiver or Modification of Informed Consent for Minimal Risk Research

- Have the criteria for a waiver of documentation of informed consent been met? Criteria are:
 1. The consent form is the only record linking the participant to the research and a potential risk would be a breach of confidentiality

OR

 2. Study involves no procedures for which written consent is normally required outside the research context. The participants decide if they want documentation.
- If the research includes children, have the criteria for a waiver of parental/guardian consent been met? Criteria are:
 1. Parental consent is not a reasonable requirement to protect child participants.
 2. Appropriate measures will be implemented to protect child participants.



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- If waiver or modification of required consent elements was proposed, have all the criteria been met? Criteria are:
 1. Waiver/alteration will not adversely affect the rights and welfare of the participants.
 2. Research could not be practicably carried out without the waiver or alteration, and when appropriate, the participant will be given relevant information after participation.

13. Other Potential Reviews

- Institutional Biosafety Committee (IBC)
- Recombinant Advisory Committee (RAC)/ National Institutes of Health Office of Biotechnology Activities (OBA)
- Institutional Animal Care and Use Committee (IACUC)
- Radiation Safety Committee (also referred to as the RDRC)
- Other

14. Other Issues and Considerations

- Are there any outstanding pre-review considerations?
- For studies involving military personnel, have the Department of Defense (DoD) requirements been met (e.g. ombudsman, confidentiality qualifier, compensation requirement, etc. per 32 CFR 219 and DODI 3216.02)?
- For international research, have applicable items in Appendix B been addressed?
- For studies involving genetic testing/tissue repository, will the participants or their doctors be given research results? Are they informed of this before enrolling?
- When should the next review occur? Should it occur more frequently than annually?
- Is future use of specimens/data addressed?