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IRB Site Questionnaires

By Norman M. Goldfarb

Institutional Review Boards (IRBs) are charged with protecting the rights and safety of study subjects. There are two basic types of IRBs: Local IRBs are affiliated with one or, sometimes, a few research sites. Independent (central) IRBs, as their name suggests, operate independently of any research site, typically under the following arrangements:

- A study sponsor from industry or government hires the IRB to review the study as a whole and then to review research sites for the study.
- A research site delegates the role of local IRB to the independent IRB.
    - The study is sponsored by industry or government.
    - The study is sponsored by an investigator at the research site (investigator-initiated trial)

IRBs need adequate information about researchers and studies to make informed decisions. They thus ask research sites to submit information in a questionnaire. A review of 25 questionnaires from independent IRBs reveals remarkable diversity. To start with, IRBs cannot even agree on what to call the questionnaire. Twenty-five IRBs give it 20 different names:

- Application for Initial Ethics Review
- Initial Review Site Application
- Initial Submission Application
- Investigator and Site Information
- Investigator Application
- Investigator Application Submission Form
- Investigator Site Questionnaire
- New Study Submission Form
- New Study Submittal Application
- Principal Investigator and Site Submission Form
- Principal Investigator Information Sheet
- Research Application
- Research Site Submission Form
- Site Application Letter
- Site Questionnaire
- Site Submission Form
- Study Application Form
- Study Questionnaire
- Submission Application for the Investigator/Site
- Submission Form

The questionnaires' questions and formats are even more diverse. This diversity raises two questions:

- What are the right questions to ask?

- How much time and confusion can be saved by standardizing the questions?

The first question applies to all sites and studies, while the second applies primarily to investigators that complete questionnaires from multiple independent IRBs.

Objectives

In this article, we will call the document a "site questionnaire." Site questionnaires are diverse because they are drafted by different authors, who must balance numerous objectives, especially in the case of independent IRBs.

The primary objectives are straightforward:

- Fulfill the IRB's regulatory, ethical and contractual responsibility to protect the rights and safety of study subjects.
- Approve sites that will protect the rights and safety of study subjects and comply with regulations.
- Obtain information for accurate and efficient IRB review.

The primary objectives are complicated by secondary objectives:

- Minimize the burden on those who complete the questionnaires.
- Educate sites about their obligations.
- Obtain documentation for use in potential FDA and OHRP inspections of the IRB.
- Avoid liability should a study subject be injured.
- Satisfy customers, i.e., study sponsors and sites.
- Support IRB members and administrative personnel.
- Do not plagiarize other questionnaires.

The Questions

Well-constructed questions generate the necessary data in an efficient manner with a minimum of head scratching by both sites and IRBs. Well-designed questions also enable IRBs to assess the expertise, sophistication and attitudes of the site. For example, it is easy to ask 10 questions about a site's informed consent process, but what the IRB really wants to know is whether the site understands how to obtain consent in an ethical manner and will put that understanding into practice.

Once an IRB decides what information to collect, it must decide how to ask the questions. Some information, e.g., names and demographics, requires factual questions. Other questions can be answered with checkboxes, free text, or both. Checkbox questions have advantages:

- It is relatively easy for sites to answer the questions, provided all possible options are covered.
- They provide the "correct" answer (which should be implemented).
- They open the site's mind to possible answers.
- They make it relatively likely that the site will provide a full and meaningful answer.
- The data collected are easy to read, easy to score, and relatively predictable.
- They are especially well suited to online forms that support branching.

However, checkbox questions also have disadvantages:

- The checkboxes may not gracefully fit all the possible options.

- It is relatively easy for sites to guess the "correct" answers, thereby telling the IRB what it wants to hear.

Free-text questions have the opposite pros and cons.

Some questions ask for information that the IRB simply needs to know. Others are surrogate markers for potential problems. For example, if another IRB has declined to approve a study, the study is not necessarily bad — perhaps the protocol has since been improved — but it is a sign of possible problems.

Some questions are difficult to word so as to elicit a meaningful answer. For example, suppose an IRB wants to know how many years of clinical research experience an investigator has. The questionnaire could simply ask, "How many years of clinical research experience to you have?" However, suppose the investigator assisted in a study during his or her residency many years ago, once had a part-time position as a study coordinator, has been a study subject, was a subinvestigator on three studies over the past 10 years, has been the principal investigator on a long-term, observational study for five years, and started an investigator-initiated Phase II study earlier this year. How should the investigator answer the question? Should he or she volunteer an explanation that works to his or her disadvantage?

The educational aspect of questions is important. Unlike purely educational materials, questionnaires force people to read the text. Checkbox questions suggest how a site should conduct research. For example, a checklist of emergency resources (defibrillator, crash cart, etc.) suggests that the site should obtain these items. On the other hand, free-text questions force sites to think through how to conduct research but can require time-consuming follow-up clarifications.

Questions for which the only acceptable answer is "yes" generally should be moved to the principal investigator's statement.

The best questionnaires include a mix of questions:

- Factual questions for simple, factual data
- Checkbox questions for data that fit into neat categories and for which the IRB needs some answer or the "correct" answer.
- Free-text questions for more complex information and to give sites the opportunity to demonstrate their expertise, sophistication and attitudes (or lack thereof).

It is also important to decide what questions not to ask. It is easy to add a question about the investigator's academic degrees, but the information is easily gleaned from a C.V. Just because some oddball circumstance happened three years ago does not necessarily justify adding a question to the questionnaire. Designing a site questionnaire is an exercise in risk management — what are the chances that leaving out a question will eventually prove unfortunate and, if so, how unfortunate?

Questionnaire Topics

The primary areas of a site questionnaire are as follows:

- General
- Study Site(s)
    - General
    - Emergencies
- Study Subjects
    - Subject Recruitment

    - Local Community
    - Demographics
    - Vulnerable Populations
    - Translation & Interpretation
    - Reimbursement & Payment
- Informed Consent
- Confidentiality & Privacy
- Principal Investigator
    - Experience & Qualifications
    - Level of Activity
    - Conflicts of Interest
    - Potential Misconduct
- Contacts
- Other

Practical Issues

In a form this complex, numbering the questions facilitates discussions. However, numbers consume space and require renumbering when a question is inserted. The MAGI form (discussed below) compromises by lettering the sections and, within each section, numbering the first question in each line. Smart electronic forms and online forms can collect optional information more easily.

Paper questionnaires (and their electronic equivalents) do not have the flexibility to gracefully handle an unknown number of subinvestigators or locations. A good option is to provide supplemental forms or flexible smart forms. The best solution, which some IRBs have adopted, is to offer web-based forms with unlimited flexibility.

MAGI's Model Site Questionnaire

MAGI's model IRB Site Questionnaire is available at www.magiworld.org/standards. This form does not incorporate the investigator's statement or ancillary forms. It is a hybrid form for multicenter, industry-sponsored and investigator-initiated studies reviewed by both local and independent IRBs. As a result, it includes or excludes questions that would be appropriate under various circumstances. For example, an independent IRB form for an industry-sponsored study does not require the generic drug name, since the study sponsor has already provided that information.

While it is unlikely that IRBs will discard their current forms in favor of MAGI's model form, a standardized template can form the basis for discussions and prove useful when IRBs review and update their forms, as they should from time to time. From the perspective of a research site that has to complete site questionnaires from multiple independent IRBs, any move toward standardization would be welcome. From any perspective, it is clear that not all of the current forms can be ideal.

Author

Norman M. Goldfarb is Managing Director of First Clinical Research LLC, a provider of clinical research best practices information services. Contact him at 1.650.465.0119 or ngoldfarb@firstclinical.com.