CONTINUING REVIEW POLICY
FOR MEDICAL AND NON-MEDICAL RESEARCH

I. Policy

The George Washington University Committee on Human Research Institutional Review Board (hereinafter referred to as the GWU IRB) will conduct continuing review of research protocols at intervals appropriate to the degree of risk, but not less than once per year. At a minimum, research projects must be reviewed and re-approved before the one-year anniversary date of the initial IRB approval.

There is no grace period for extending the continuation of research related activities beyond the expiration date of IRB approval. Thus, if IRB approval of a study expires due to lapse in continuing review the following steps will be taken:

A. Subject accrual/enrollment will be suspended pending re-approval of the research by the GWU IRB;
B. Continuation of research interventions or interactions in already enrolled subjects may continue pending re-approval of the research by the GWU IRB, but only if the IRB finds that it is in the best interest of individual subjects to do so;
C. The GWU IRB will address, on a case-by-case basis, those rare instances when failure to enroll a new subject pending re-approval of the research by the GWU IRB would seriously jeopardize the safety or well being of a prospective subject.

II. Purpose

The GWU IRB Continuing Review (CR) policy is intended to:

A. Describe the scope and frequency of continuing review approvals and what will occur if there is a lapse in continuing review of research protocols;
B. Describe the categories of continuing review and how protocols are reviewed based on a study’s continuing review category, i.e., Expedited Review (ER) or Full Committee (FCR);
C. Identify the documentation required for continuing review approval via the Continuing Review Data Collection/Project Termination Form (available at www.gwumc.edu/research/forms.htm) and the supporting documentation, (as applicable) which is required to begin the continuing review approval process, and
D. Explain how the GWU Office of Human Research (OHR) calculates the continuing review date.


A. Scope and Frequency of Continuing Review Approval

1. Scope of Continuing Review Approval

Continuing Review Policy
Revised July 2003
Continuing review must be substantive and meaningful. The criteria for continuing review are the same as those for initial review. Therefore, the GWU IRB (or the reviewer for protocols reviewed under an expedited procedure) will determine:

a. That the risks to subjects continue to be minimal and reasonable in relation to the anticipated benefits;
b. That the selection of subjects continue to be reasonable in relation to anticipated benefits;
c. That informed consent/assent continues to be appropriately documented, if applicable;
d. That research subject authorization continues to be appropriately documented, if applicable;
e. That there are:
   i. Provisions for safety monitoring of the data;
   ii. Protections to ensure the privacy of subjects and confidentiality of data; and
   iii. Appropriate safeguards for vulnerable populations.

Continuing review of research protocols applies to protocols in which human subject enrollment is ongoing as well as to protocols in which human subject enrollment has been closed and the research interventions completed, but the data from the subjects continues to be collected and analyzed.

2. Frequency of Continuing Review Approval

The frequency of continuing review approval for research protocols generally occurs on an annual basis; however, the GWU IRB has discretion to require protocols to be reviewed/renewed more frequently than annually when warranted. The following is a non-exhaustive list of the types of research protocols requiring more frequent than annual continuing review:

a. Studies approved pursuant to FDA regulations regarding Waiver of Informed Consent in Emergency Research;
b. Use of Humanitarian Use Devices (reviewed every 6 months);
c. Studies overseen by a Data Safety Monitoring Board (DSMB) in which the DSMB requires continuing review to occur on a less than annual basis;
d. Studies involving a Recombinant Advisory Committee (RAC); or
e. Studies in which the GWU IRB or Principal Investigator requests that continuing review approval be conducted more frequently than annually.

B. Categories of Continuing Review

The continuing review category of a research protocol is dependent upon the protocol’s initial review category (expedited or full committee) and the level of risk associated with the study. As a general rule, the full IRB conducts the continuing review of a research project that was initially approved by the full IRB, unless the project is found to be appropriate for expedited review approval.

1. Studies Eligible for Full Committee Continuing Review Approval: The IRB will conduct a continuing review of a protocol using the primary reviewer system, i.e., the same review procedure used when the full committee originally reviewed the protocol, unless the protocol has been modified such that it can be reclassified as eligible for expedited review approval. Please note that when using the primary reviewer system, the full, convened IRB Committee will discuss the protocol and make a determination with recorded vote.
2. **Studies Eligible for Expedited Continuing Review Approval.** The IRB Chair or his/her designee will conduct the review and approval on behalf of the full IRB Committee. The expedited review determination will be reported to the full IRB Committee via the agenda of the next scheduled full committee meeting following the determination. Pursuant to federal regulation, the following studies are eligible for expedited continuing review.

   a. Any research protocol initially approved via expedited review unless the protocol has changed or will change, such that expedited review would no longer be permitted for continuing review;

   b. A research protocol initially approved by the full IRB, but at the time of continuing review the IRB finds that:

      (i) The research is permanently closed to enrollment of new subjects; all subjects have completed all research-related interventions; and the research remains active only for long-term follow-up of subjects; OR

      (ii) No subjects have been enrolled and no additional risks have been identified; OR

      (iii) The remaining research activities are limited to data analysis.

C. **Documentation Required for Continuing Review Approval**

   1. **Full Committee Review.** In order for a study to be considered for full committee continuing review, the Principal Investigator must submit 15 copies of the following:

      a. the Continuing Review Notice;

      b. a completed Continuing Review Data Collection/Project Termination Form (which is available at [http://www.gwumc.edu/research/forms.htm](http://www.gwumc.edu/research/forms.htm)) with supporting documentation (as applicable);

      c. for those studies in which subjects are still being enrolled, an unstamped version of the most recently-approved Informed Consent/Assent Form/Research Subject Authorization Form (RSAF) (all of which are available at [http://www.gwumc.edu/research/forms.htm](http://www.gwumc.edu/research/forms.htm)) as applicable; or

      d. for studies in which the Principal Investigator is seeking approval of modifications at the time of continuing review approval, the Principal Investigator must include 15 copies of both the Continuing Review Notice and the Continuing Review Data Collection/Project Termination Form, along with all proposed modified documents, e.g., informed consent/assent forms, RSAFs, recruitment materials, data-gathering materials (i.e., surveys, questionnaires, etc.) as applicable. If modifications are being proposed for any of the above referenced documents, the Principal Investigator must submit 15 copies of the existing document(s) with the proposed changes highlighted and 15 copies of the new version document(s). Whenever changes are made to any of these documents, a new version date in the footer section of each modified document(s) must be included.

   **IRB Members Review Materials.** All IRB members receive and review the following:

   a. the documents noted above, and

   b. a protocol summary;
c. if applicable, a copy of the current informed consent/assent, research subject authorization document and any newly revised documents. When reviewing the current informed consent/assent/research subject authorization document, the IRB ensures that:

(i) The currently approved or proposed consent/assent/research subject authorization document is still accurate and complete; and
(ii) Any significant new findings that may relate to the subject’s willingness to continue participation are provided to the subject.

What the Primary Reviewer Receives and Reviews. In addition to the items listed above, the primary reviewer will receive a copy of, or be provided access to, the complete IRB-maintained file that includes all modifications previously approved by the GWU IRB.

**Full Committee Continuing Review of Multi-Center Trials Monitored by a DSMB, Other Similar Body, or Sponsor.** When the full IRB conducts continuing review of a multi-center research project monitored by a DSMB, other similar body, or a sponsor, the GWU IRB may rely on the DSMB/sponsor report indicating that the DSMB/sponsor has reviewed study-wide serious adverse events, interim findings, and any recent literature that may be relevant to the research, in lieu of requiring that this information be submitted directly to the GWU IRB. Even if the GWU IRB receives such a statement from the DSMB/sponsor, the GWU IRB must still receive and review reports of local, on-site adverse events, serious adverse events, unanticipated problems involving risks to subject or others and any other information needed to ensure that its continuing review is meaningful and substantive. (See OHRP Guidance on Continuing Review, July 11, 2002)

2. **Expedited Review.** In order for a study to be considered for expedited continuing review, the principal investigator must submit one (1) copy of the same information outlined above under section **C1. Full Committee Review**.

What the GWU IRB Chair/Designee Receives and Reviews. When reviewing research that has qualified for expedited review approval, the IRB Chair/or his/her designee receives and reviews the same information referenced above under section **C1. Full Committee Review – IRB Members Review Materials**.

**D. How To Determine Continuing Review Date**

1. **For Studies Approved/Renewed Under Full Committee Review (FCR).**

The continuing review date for studies approved/renewed under FCR is calculated based on the date the full committee convened and approved the study for initial/continuing review. Thus, the continuing review date is calculated based on the date the full committee approved the study either as submitted or approved it pending submission of additional information (i.e., conditionally approved); the date has nothing to do with the date the IRB receives requested additional information. In order to ensure that studies do not expire due to lapse in continuing review approval, the GWU IRB shortens the IRB approved continuing review period, which is always 12 months or less. The continuing review date is abbreviated by considering the date the full IRB reviewed and approved the study for initial/continuing review, adding the IRB approved continuing review period to that date (e.g., 12 months), and then selecting the last day of the month preceding that date. This explains why, depending on when a particular protocol is approved/renewed by the GWU IRB, a particular study’s next expiration/renewal date may be less than 12 months despite the
IRB’s final approval memorandum/continuing review form refers to a 12-month approval period.

For example: Assume that the IRB conditionally approved a study at its September 10, 2002 meeting for a period of 12 months, i.e., September 10, 2003. In an IRB conditional approval memorandum, dated September 15, 2000, the PI is informed of the conditional approval and the additional information requested. Assume further that the PI submits the requested additional information to the IRB on October 5, 2002. In this instance, the expiration/renewal date of September 10, 2003 (12 months from the date the full committee conditionally approved the study) would be recalculated to August 31, 2003, in an effort to prevent study expiration due to a lapse in continuing review approval. Please note that the continuing review date has nothing to do with the date the IRB received the requested additional information, i.e., October 5, 2002.

2. For Studies Approved/Renewed under Expedited Review.

The continuing review date for studies approved/renewed under the expedited review process must occur within (1) year of the date the IRB Chair or his/her designee rendered final approval/renewal to the studies. OHR applies the same procedures noted above in order to ensure that studies do not expire due to lapse in continuing review approval.

III. Communicating Continuing Review Date

The Principal Investigator will be initially informed of the expiration date of his/her protocol via a final IRB approval memorandum that is generated following the initial IRB review of a protocol. The Principal Investigator will again be informed of the expiration date of his/her protocol by way of a 60-day and 30-day Continuing Review Notice. A Continuing Review Data Collection/Project Termination Form will accompany each reminder notice.

Although OHR has implemented an administrative process intended to assist the Principal Investigator in avoiding study expiration due to lapse in continuing review approval, it is the Principal Investigator’s responsibility to ensure the protocol is renewed, i.e., reviewed and IRB-approved prior to the study’s expiration date regardless of whether the principal investigator received a continuing review notice.

It is also the responsibility of the Principal Investigator to complete the Continuing Review Data Collection/Project Termination Form in its entirety and include the required supporting documentation. Please note that submitting an incomplete Continuing Review Data Collection/Project Termination Form can cause a delay in the continuing review process that may ultimately cause a lapse in continuing review approval.

IV. Lapse in Continuing Review

Continuing review of all research protocols approved via the expedited and full committee review process is mandatory. GWU IRB approval of all such protocols automatically expires after one year (or less) unless reviewed and re-approved by the IRB prior to the study’s expiration date. Please note that simply submitting a Continuing Review Data Collection/Project Termination Form to the GWU IRB, without receiving IRB continuing review approval of the study prior the study’s expiration date results in a lapse in continuing review approval for the study. Thus, in order to avoid a lapse in continuing review approval, the Principal Investigator must submit the requested continuing review information to the GWU IRB within a time frame that allows the study to be reviewed and re-approved by the IRB prior to the expiration date.
If GWU IRB approval of a study expires as a result of a lapse in continuing review approval, all study related activities must cease, unless the IRB determines that it is “in the best interest of individual subjects” to continue participation in the research pending re-approval of the research by the IRB.\(^1\) An “in the best interest” determination will only be granted if the Principal Investigator requests the GWU IRB to make such a determination. The determination allows the study to remain active pending re-approval of the research by the IRB, but only for those subjects identified in the request; all study activities related to other subjects must cease during the lapse in continuing review. Moreover, enrollment of new subjects is generally prohibited once IRB approval has expired.

If a study expires due to lapse in continuing review approval and a request for an “in the best interest of individual subjects” determination is not received by the GWU IRB, the study cannot proceed until the protocol and all supporting documents are reviewed and re-approved by the GWU IRB.

V. IRB Review of a Study Due for Continuing Review Approval

The GWU IRB will review continuing review information for a study that is due for continuing review approval as follows:

A. Continuing Review Information Submitted to the IRB Prior to or on Study Expiration Date

The GWU IRB will accept all continuing review data collection forms and accompanying information that is submitted to the IRB prior to or on the study expiration date. The GWU IRB will consider this continuing review data collection form along with the information already contained in the IRB-maintained study file. The GWU IRB will rely on the above referenced information even if IRB continuing review approval is not obtained until after the study has expired. Please note that during the lapse in IRB approval period, the PI is prohibited from engaging in any study related activities.

A full committee review example. Assume that on March 29, 2003, a principal investigator submits to the GWU IRB continuing review information for a full committee review study that is due to expire on March 31, 2003. Let’s assume further that the next scheduled IRB meeting is not until April 14, 2003. During that meeting the IRB votes to approve the study for an additional 12 months pending receipt of minor modifications as requested by the full committee. The modifications are submitted to and approved by the IRB on April 30, 2003. In this scenario, the IRB continuing review approval date is the date the full committee convened to review the study and conditionally approved it, i.e., April 14, 2003. In this scenario, the study experienced a short lapse in IRB approval (April 1, 2003 – April 13, 2003).

In this scenario, the Continuing Review Notice will include a stamp that will reflect GWU IRB approval from April 14, 2003 through March 31, 2004. The Continuing Review Notice will also inform the Principal Investigator: (1) of the period in which there was a lapse in continuing review approval (April 1, 2003 – April 13, 2003); (2) that all research-related activities should have ceased during the lapse in continuing review; and (3) if research activities were conducted during the lapse in continuing review approval, no data generated from those activities can be used for the study as the data was collected without IRB approval.

An expedited review example. Assume that on July 29, 2003, a PI submits to OHR a Continuing Review Data Collection & Study Termination Form for an expedited review study that is due to expire on July 31, 2003. An OHR staff member reviews the Continuing Review Data Collection

\(^1\) The GWU IRB can make such an “in the best interest of individual subjects” determination when it is determined that the halting of a study medication/medical device would result in additional risks to subjects.
Continuing Review Policy

Revised July 2003

& Study Termination Form and determines that information is missing, e.g., an ICF for a study that is currently enrolling subjects. On July 30, 2003, the OHR staff member notifies the PI of the missing information and informs the PI that the IRB Chair cannot approve the study for an additional approval period until the IRB Chair reviews the ICF. Subsequently, on August 20, 2003, the PI submits the requested ICF document. The IRB Chair reviews and approves the study on the same day for an additional 12 months. In this scenario, the study experienced a short lapse in IRB approval the continuing review approval (August 1, 2003 - August 19, 2003 - the date the IRB Chair or designee renders final IRB approval.)

In this scenario, the Continuing Review Notice will include a stamp that will reflect GWU IRB approval from August 20, 2003 through March 31, 2004 - 12 months from the last scheduled expiration date of July 31, 2003. The Continuing Review Notice will also inform the Principal Investigator: (1) of the period in which there was a lapse in continuing review approval (August 1, 2003 – April 19, 2003); (2) that all research-related activities should have ceased during the lapse in continuing review; and (3) if research activities were conducted during the lapse in continuing review approval, no data generated from those activities can be used for the study as the data was collected without IRB approval.

Continuing Review Information Submitted to the IRB Prior to or on Study Expiration Date and Subsequent Failure by a Principal Investigator to Respond to Continuing Review – Requests for Additional Information

The GWU IRB reserves the right to administratively terminate any studies in which the PI has failed to respond to an IRB/OHR continuing review - requests for additional information, or other similar additional information requests, within 30 –60 days from the request.

B. Continuing Review Information Submitted to the IRB After Study Expiration Date

The GWU IRB will NOT accept continuing review information that is submitted to the IRB after a study has expired. The GWU will only review such a study if the Principal Investigator submits a new IRB submission package, including a new IRB submission form, protocol, informed consent/assent form(s) (if applicable), research subject authorization form (if applicable), and all associated documents are reviewed and approved by the GWU IRB as a new study with a new IRB number.

An official memorandum entitled “Administrative Termination Due to Lapse in Continuing Review” will be generated the day after a study expires if no continuing review information has been submitted to the IRB prior to the study expiration date. This memo will be sent to the Principal Investigator of such a study and will inform the Principal Investigator of the requirements necessary to proceed with the research activities related to the expired study at GWU.