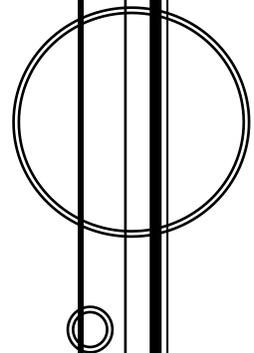


The Alberta Health Research Ethics Harmonization Initiative Reciprocity Pilot Evaluation Report

The vision of the HREH is to achieve an integrated model for health research ethics review in Alberta that supports health research, encourages multi-site research and attracts additional health research activity and investment to the province.



THE ALBERTA HEALTH RESEARCH ETHICS HARMONIZATION INITIATIVE RECIPROCITY PILOT EVALUATION REPORT

Executive Summary

A key aspect of the Alberta Health Research Ethics Harmonization (HREH) initiative is implementation of Alberta's Health Research Ethics Reciprocity Agreement, signed in February 2011 by the six Alberta institutions that host a Health Information Act-designated human health research ethics board (REB). The Agreement lays out requirements for the review of multi-site health research ethics applications that must be reviewed by more than one REB ("reciprocal reviews"). Between November 2011 and April 2012 a set of agreed upon processes for the review of such applications were piloted by the six REBs. This project was known as the "Reciprocity Pilot."

The goal of the Reciprocity Pilot was to apply, evaluate and refine a formalized common set of processes for the conduct of reciprocal reviews, as per the Reciprocity Agreement. Objectives were:

1. To gain a clear understanding of the processes for reciprocal reviews that are: clear and transparent to researchers, REB administrators and REB members; are streamlined so as to minimize the time between application submission and REB approval decision; reduce the workload for all parties; and, are consistent across REBs;
2. To ensure that clear, formalized communication channels between REBs are established and that these channels facilitate the transfer of necessary information and enable problem-solving for the resolution of concerns; and,
3. To begin to develop a set of metrics for assessing and improving performance of the research ethics review process when more than one REB approval is required.

Between November 15, 2011 and April 30, 2012, REB administrators from the six HIA-designated REBs tracked information about reciprocal reviews conducted by their REBs. This data was subsequently collected and analyzed. A meeting with the REB administrators to validate and discuss the data was held in May. In addition, interviews were conducted with three of the researchers/study coordinators whose applications were included in the pilot. A fourth researcher provided short remarks about the process by e-mail.

Key findings include:

1. Among the six participating REBs, 12 reciprocal reviews were reported during the five-month pilot period.
2. As per the Reciprocity Agreement, all reciprocal reviews were conducted as delegated reviews.
3. For the 11 studies for which data was reported, the average time from receipt of the application by the receiving REB to its final decision was 10.6 working days; the range was between 1 and 31 working days.
4. Four applications required neither minor nor substantial changes. For these applications, the average approval decision time was five working days.
5. Two-thirds (8) of the applications reviewed by receiving REBs required minor revisions or additional information; one required substantial revisions. A common concern was failure to include local, site-specific contact information on the informed consent form. These issues were readily addressed by the REB administrator contracting the researcher or the first REB administrator. However, requests for changes and associated response time from researchers or sponsors created delays in the approval process.
6. Communication channels as laid out in the pilot process flow maps were deemed by REB administrators to be clear and effective; they were somewhat less clear for researchers and study coordinators in

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some instances. One study coordinator noted it would be good to have more information about the process available on the web.

7. Researchers/study coordinators expressed satisfaction with the reciprocal review process and noted the second review was quicker than the first. They commended REB administrators for being helpful and easy to work with. REB administrators noted the processes worked well but could be further improved with some minor changes (see recommendations below).

Based on these findings and recognizing the limitations created by the small number of cases reported in the pilot period, six key recommendations can be made:

1. The piloted reciprocal review processes should be adopted as the provincial processes for the review of multi-site ethics applications (“reciprocal reviews”) with one minor revision: changing the agent responsible for submitting the application to the second and subsequent REB(s). Process maps for the pilot indicated the first REB would submit to the second. However, it is recommended that the researcher/study coordinator be the agent to submit the application to the second (and subsequent, if applicable) REB(s).
2. Greater efficiencies could be created by reducing the number of applications that require additional information or revisions by the receiving REB(s). It would be helpful to track the reasons why applications are returned to researchers for amendments or further documentation. The information generated could then be used to develop and implement information/training about the requirements for a complete ethics application.
3. Research sponsors should be informed that when conducting multi-site studies in Alberta, once the first study site has completed the ethics review process, under the Reciprocity Agreement, the same study conducted in other sites is eligible for delegated review.
4. Collecting data about the approval process itself helped to inform and identify potential improvements to ongoing practices. Based on that experience, this approach should be considered and implemented as part of future reviews.
5. To further support ongoing learning and improvement, more effort is required to obtain researcher and study coordinator feedback regarding the reciprocal review process, and more broadly, the entire ethics review process. One approach would be to develop a process through which researchers/study coordinators automatically receive a feedback form once their ethics application process is completed. This approach could be expanded at a later date to inform ongoing improvements to human health research ethics review processes in the province.
6. A reassessment of the effectiveness and efficiency of the reciprocal review processes should be conducted in 12 to 18 months, following the migration of all REBs to a common electronic platform, and on an ongoing basis thereafter.

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Introduction

The purpose of this report is to present the findings of the Reciprocity Pilot – a project facilitated by Alberta Innovates-Health Solutions under the auspices of the Alberta Health Research Ethics Harmonization (HREH) initiative. The Reciprocity Pilot was designed to test and refine an agreed upon set of processes for reviewing human health research ethics applications that require review by more than one of the six Health Information Act (HIA)-designated research ethics boards (REBs)¹ in Alberta.

Background information is provided, including: relevant information regarding the HREH; an overview of the Reciprocity Agreement and Pilot process; and an outline of the adopted evaluation approach. This is followed by presentation of the evaluation findings. The report is concluded with recommendations for strengthening and further streamlining the reciprocal review processes.

Background

The Alberta HREH initiative is led by the Executive Sponsors – a group of senior leaders from each of the six institutions in Alberta that host an HIA-designated research ethics board (REB). Resources, facilitation and secretariat services are provided by Alberta Innovates Health Solutions.

The HREH aims to achieve a streamlined, effective, collaborative and integrated model for human health research ethics review supported by appropriate technology. “Harmonization” in this initiative means that administrative processes associated with human health research ethics review, from the point of the view of the researcher, will be transparent and consistent, and that the Research Ethics Offices, while maintaining their independence, will work in a collaborative manner to facilitate the provincial health research ethics system.

The vision of the HREH is:

To achieve an integrated model for health research ethics review in Alberta that supports health research, encourages multi-site research and attracts additional health research activity and investment to the province. The achievement of this vision will also support our national ability to attract research to Canada.

The Research Ethics Reciprocity Agreement

A key aspect of the HREH is implementation of the *Research Ethics Reciprocity Agreement* (RER), signed by the Executive Sponsors in February 2011. The purpose of the agreement is to facilitate cooperation and collaboration among the signatories’ REBs, and in particular, ethics reviews for studies conducted by, or otherwise under the jurisdiction of two or more REBs.

“Reciprocity” means that when an ethics approval is required by more than one health REB in Alberta, the researcher applies to the first REB (i.e. the researcher’s home REB), which conducts a “full” review as has been done in the past. Following approval by the first REB, subsequent REB reviews (“reciprocal reviews”) are completed in a delegated manner and enabled by effective channels of communication between REBs and the

¹ These include:

- Alberta Health Services: Alberta Cancer Research Ethics Committee (ACREC)
- Alberta Innovates – Health Solutions: Community Research Ethics Board of Alberta (CREBA)
- Alberta Innovates – Health Solutions: Research Ethics Review Committee (RERC)
- University of Alberta: Health Research Ethics Board (HREB)
- University of Calgary: Conjoint Health Research Ethics Board (CHREB)
- University of Lethbridge: Human Subject Research Committee (HSRC)

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researcher. This applies to all ethics applications, including those determined to be “high risk”, which previously would have undergone a full review by the second and subsequent REBs. Alberta is the first province or territory in Canada to achieve such an agreement. Key elements of the Reciprocity Agreement pertinent to the reciprocal ethics review processes are presented in Table 1 below.

Section	Text
7. First Review	7.1 When the REB of a party receives an application for a first review, the REB shall review the application in compliance with that REB’s normal processes and procedures and in compliance with the requirements of this agreement
	7.2 A first review completed in compliance with this agreement shall constitute a recognized prior review
8. Subsequent Review	8.1. Subject to Section 8(2), upon a receiving REB receiving notification of a recognized Prior review, the receiving REB as a matter of course, shall not conduct a full review of the Application but may conduct the Subsequent Review: <ul style="list-style-type: none"> a.) on a delegated basis; b.) by the Chair of the receiving REB or by the Chair and one other member of the receiving REB, and; c.) taking into account all relevant considerations that are specific to the REB, its party’s jurisdiction and location, including considerations that are specific to local populations of potential study participants.
	8.2. Notwithstanding Section 8.1., if a receiving REB has any questions or concerns related to any aspect of the First review, the Chair of the receiving REB shall communicate and discuss such questions and concerns with the Chair of the REB which conducted the First review, and thereafter, the Chair of the receiving REB may, at that Chair’s discretion, require that the subsequent review be conducted as a full review or as a delegated review and on whatever terms the Chair of the receiving REB determines.
	8.3. A receiving REB shall advise the REB conducting the first review and all other receiving REBs identified on the application of: <ul style="list-style-type: none"> a.) any and all concerns of the receiving REB related to the considerations that are specific to the receiving REB, its party’s jurisdiction and location, including considerations that are specific to local populations of potential study participants; b.) any and all other concerns of the receiving REB; and c.) the decision of the receiving REB on the Subsequent review.
	8.4. The conduct of subsequent reviews that are full reviews shall be reviewed on an annual basis by a committee of chairs of REBs for the parties. If subsequent reviews which are full reviews constitute more than 10% of all recognized prior reviews, the reasons for such full reviews shall be explored and solutions provided by the committee of chairs of REBs.

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Developing Common Reciprocal Review Processes

Once the Reciprocity Agreement was signed, an assessment of existing review processes and needs of each participating REB was conducted. Completed in the summer of 2011, the assessment generated comparable information which revealed both similarities and differences in the operations of the six REBs. Variances in the physical environment, the type of research application, institutions served and the amount of information technology support available meant that each office had some unique internal business processes. A key outcome of these assessments, however, was agreement among the six REB offices that, overall, the key functions they performed were the same and that these functions were managed so as to be comparable and consistent among the REBs.

On October 3, 2011, chairs, representative members and administrators from the six REBs came together for the first time to develop and agree upon a set of common processes for reciprocal reviews. The process maps developed at this meeting (one for health research; one for clinical trials) were subsequently reviewed by each of the REB offices and ultimately formed the basis for pilot testing of the reciprocal review processes – the “Reciprocity Pilot.”

Piloting the Reciprocal Review Processes: Goal, Objectives and Approach

The goal of the Reciprocity Pilot was to apply, evaluate and refine a formalized common set of processes for the review of ethics applications requiring more than one REB approval (as per the Reciprocity Agreement), with specific attention to communication processes and mechanisms for exchanging the information necessary for ethics approval decisions.

Objectives included:

1. In accordance with the Reciprocity Agreement, to gain a clear understanding of the processes for the review of ethics applications requiring more than one REB approval that:
 - i. are clear and transparent to researchers, REB administrators and REB members;
 - ii. are streamlined so as to minimize the time between ethics application submission and approval decision;
 - iii. reduce the workload associated with the ethics review process for researchers, REB administrators, and REB members; and,
 - iv. are consistent across REBs.
2. To ensure that clear formalized communication channels between respective REBs are established, and that these channels facilitate the transfer of necessary information and enable problem solving for resolution of concerns.
3. To begin to develop a set of metrics for assessing performance of the research ethics review process when more than one REB approval is required.

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Evaluation Approach: Continuous Quality Improvement

In essence, the ultimate aim of the piloting process was to test the draft reciprocal review processes and continually refine them in order to: enhance their transparency and consistency among REBs; minimize the workload associated with the process for all parties; ensure clear and formalized communication channels; and make the processes as streamlined as possible. Because of this emphasis on continual refinement, the pilot was ideally suited to a continuous quality improvement approach.

As such, a *Plan, Do, Study, Act (PDSA)* approach was employed. PDSA is a process of planning an approach, implementing it, studying the implementation process, determining ways and means of improving the approach and/or its implementation, then implementing and evaluating the revised approach and repeating the cycle again. As such, it is an iterative process of learning and ongoing improvement.

Applied to the Reciprocity Pilot, and without having a solid estimate of the number of reciprocal reviews to expect, the intended PDSA approach was to follow the first two or three reciprocal reviews, then debrief with the participating REB office members (Chair or Administrator, or both, as indicated), as well as study coordinators or researchers. The goal was to understand their experiences of the process, with feedback to be obtained regarding:

- Perceived transparency of the reciprocal review process;
- Ease of understanding the reciprocal review process;
- Workload associated with the reciprocal review process;
- Use of, and satisfaction with, various communication channels for ensuring smooth transfer; of the application from the first REB to second and subsequent REBs for review; and,
- Consistency of the process amongst REBs.

Based on the feedback obtained in this debriefing exercise, it was anticipated that any required or recommended refinements to the review process would be made and communicated to the REBs for use in subsequent reciprocal reviews. This cycle was to continue in an iterative fashion until no further changes were required or recommended.

A second component of data collection was the tracking of key dates and timelines as the ethics applications were moved through the reciprocal review process. A data collection form was designed and provided to REB administrators, along with instructions for use. Data collection points for health research and clinical trials ethics applications included the dates of:

- Receipt of the ethics application by the receiving (second) REB;
 - Whether modifications were required before conduct of the second REB review, and if so, the nature of these modifications and the date when the revised application was re-submitted for review;
- Date sent for second REB review;
- Type of review conducted;

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- If minor revisions were required, the nature of these revisions and date the revised application was returned for review;
- If substantial revisions were required, the nature of the revisions and the date the revised application was returned for review;
- Date of second REB decision;
- Date researcher/study coordinator notified of second REB decision.

(Note that because the focus was on reciprocal reviews, timelines for review by the first REB were not included in this pilot.)

Prior to commencement of the pilot, and throughout the course of the pilot, the HREH Project Manager and the Evaluation Coordinator communicated with REB administrators for each of the six participating REBs to explain the goal and objectives of the pilot, the approach adopted, and how to use the data collection form. The REB administrators were instrumental in tracking timelines, communicating with the HREH Project Manager and Evaluation Coordinator and debriefing with them about the pilot findings.

The Reciprocity Pilot commenced on November 15, 2011 and was to be completed February 29, 2012.

Reciprocity Pilot Evaluation Findings

Although the Reciprocity Pilot commenced November 15, the first reciprocal review wasn't reported until late January. By mid-February it was apparent that the number of reciprocal reviews being conducted in the province was likely smaller than originally anticipated. The small number of cases necessitated a re-thinking of the PDSA approach. With insufficient numbers for successive refinements of the process, it was decided instead to wait until there were at least several cases to discuss with REB administrators. Thus, the pilot was extended, with the closing date to be determined pending the number of cases reported within the following few months.

At the same time, the University of Calgary's Conjoint Health Research Ethics Board (CHREB) office expressed concerns about sharing confidential researcher information via the data collection form developed for the pilot. This REB opted instead to manually review files from the previous several months and compile a table which included timelines, basic information about types of modifications required to applications received, the type of review conducted and communication channels employed. This data, constituting 14 reciprocal reviews, covered the period from April 2011 (before the pilot process had begun) to January 18, 2012. Seven cases occurred within the Reciprocity Pilot period and as such, only these were included in the data analyses reported below².

By April 30, 2012, twelve reciprocal reviews, including the seven noted above from CHREB, had been reported. It was decided to present the data associated with these twelve cases to the REB administrators for their feedback, insights and discussion. During the meeting, held May 10, 2012, the administrators confirmed that the number of reciprocal reviews conducted in the pilot period was typical. They did note, however, that two or three cases may have been missed during the pilot period.

² It should be noted, however, that with the removal of one outlier, the average time for completion of the reciprocal reviews reported by CHREB was 9.7 working days, with four of the reviews conducted within one day of receipt of the application. In these 14 cases, all delays in reciprocal reviews appear to have been due to delays in researchers/study coordinators re-submitting their amended applications. It should also be noted that, given an average of more than one reciprocal review per month, it is likely that additional reciprocal reviews were completed by this REB between January 18 and April 30, when the Reciprocity Pilot was eventually concluded.

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Subsequent to the May 10 meeting, the five researchers or study coordinators who had submitted reciprocal review applications to non-CHREB REBs were contacted by REB administrators to secure permission to be contacted by the HREH Evaluation Coordinator. Four of these people agreed to be interviewed. Three were interviewed and, due to time constraints, the fourth was only able to send a brief comment by e-mail about his/her experience with the reciprocal review process. The interviews, which lasted no more than 30 minutes each, focused on researcher/study coordinator experiences with, and perceptions of, the reciprocal review process in terms of transparency, “user-friendliness” and ease of understanding of the process, effort/workload required, communication channels with the REBs, timeliness of the process, and any other comments they wished to make.

Limitations

Given the small number of reciprocal reviews reported during the pilot period, the findings presented below should be considered and weighted accordingly. There are insufficient numbers, for example, to make conclusive statements about the “state” of reciprocal review processes amongst the six HIA-designated REBs in the province. Further, it was not possible to speak with the seven researchers/study coordinators whose applications were reviewed by the CHREB at the University of Calgary. However, REB administrators’ validation of findings, along with feedback provided by the four researchers/study coordinators lend credibility to the data.

Summary of Key Findings

A summary of the data collected during the pilot is presented in Table 2. The table includes a description of each reciprocal review (“case”), including date received by the receiving REB, dates of various aspects of the review process through to the date of final decision by the receiving REB and calculation of the total number of days (working days and calendar days) from receipt of the application to final decision.

Key findings, based on this data, key informant interviews, and the meeting with REB administrators are presented following Table 2.

Table 2. HREH Reciprocity Pilot Data July 16, 2012

		Need for changes /info identified by REB administrator (before sending for review)				Need for revisions identified by reviewer						
Case & Receiving REB	Date Received from Sending REB or Researcher	Changes needed before review?	Date Amended App Received	Date Sent for Review	Type of Review	Minor Changes Needed?	Substantial Changes Needed?	Date Returned for Review	Date of Final Decision	Date Researcher Notified	Total Time for Second Review Decision (Calendar days/Working days)	Comments
1 HREB	Jan 26	Yes (Missing UofC application and consent forms)	Jan 30	Jan 31	Delegated	No	Yes (No assent included with application)	Not reported	March 9	March 9	44/31	Clinical trial Delay due to researcher submitting amended original application REB admin to REB admin communication to discuss and REB admin to researcher communication
2 HREB	Feb 15	No	NA	Feb 15	Delegated	Yes (Editorial to Smart Form, local contacts, more info re: study process requested Feb 16)	No	Not reported	March 9	March 9	23/17	Health research Delay due to researcher submitting amended application
3 HREB	Mar 12	No	NA	Mar 12	Delegated	Yes (Definitions, minor edits to consent form)	No	April 19	April 19	April 19	39/27	Health research Delay due to researcher submitting amended application
4 CHREB	Nov 17	No	NA	Nov 17	Delegated	No	No	NA	Nov 17	Not reported	1/1	UofC data was manually extracted from records. Only data from applications reviewed after Nov 15 (beginning of pilot) is reported herein. All Reviewer concerns were resolved by phone calls or e-mails.
5 CHREB	Nov 25	No	NA		Delegated	Yes	No	Dec 1	Dec 1	""	7/5	
6 CHREB	Nov 30	No	NA		Delegated	Yes	No	Dec 8	Dec 8	""	9/7	
7 CHREB	Dec 16	No	NA		Delegated	Yes	No	Dec 21	Jan 5	""	21/11 (Xmas)	
8 CHREB	Dec 22	No	NA		Delegated	Yes	No	Jan 5	Jan 9	""	19/9 (Xmas)	
9CHREB	Jan 2	No	NA		Delegated	No	No	NA	Jan 11	""	10/8	
10 CHREB	Jan 13	No	NA		Delegated	No	No	NA	Jan 18	""	6/4	
11 CREBA	Mar 28	Yes	April 3		Delegated	No	No	NA	April 10	April 10	13/8	
12 RERC	Feb 8	No	NA		Delegated	No	No	NA	?		~5/5	Reviewed & approved in a "few days"; not included in calculation of averages

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Number of Reciprocal Reviews by REB

Across the six participating REBs, 12 reciprocal reviews were reported between November 15, 2011 and April 30, 2012. Data was reported for 11 of these applications. The number of reciprocal reviews reported by each REB for the pilot period is listed in Table 3 below.

Institution	REB	Number of Reciprocal Reviews Reported in Pilot Period
Alberta Health Services	Alberta Cancer Research Ethics Board (ACREC)	0
Alberta Innovates – Health Solutions	Community Research Ethics Board of Alberta (CREBA)	1
College of Physicians & Surgeons of Alberta	Research Ethics Review Committee (RERC)	1
University of Alberta	Health Research Ethics Board (HREB)	3
University of Calgary	Conjoint Health Research Ethics Board (CHREB)	7*
University of Lethbridge	Human Subject Research Committee (HSRC)	0

*Reported between November 15, 2011 and January 18, 2012 only

The REB administrators agreed that, while two or three cases may have gone unreported during the pilot period, these numbers are within the normal range for reciprocal reviews conducted by their REBs. They noted, however, that some ethics applications for clinical trials might not have been reported. For example, for industry-sponsored studies, principal investigators at one site may have been unaware that the study they were involved with was also being conducted in other sites. Thus, they may not have been aware that previous applications for the same protocol had been submitted to, and approved by REBs for other institutions in which the trial was being conducted. Accordingly, they would not have submitted their application as being eligible for reciprocal review. At this point, REBs rely on researchers/coordinators to self-identify whether an application is eligible for reciprocal review.

Based on the number of reciprocal reviews reported during the pilot study, and estimating that the University of Calgary’s CHREB conducts more than one reciprocal review per month, it can be very roughly estimated that the annual volume of such reviews amongst the six REBs is around 30 – 35 reviews.

Type of Reciprocal Review Conducted

As per the Reciprocity Agreement, all reviews conducted by the receiving REBs were conducted as delegated reviews. REB administrators noted there were no concerns that warranted any other type of action.

Timelines for Completion of Reciprocal Reviews

- For the 11 studies for which data were reported, the average time from receipt of the application by the receiving REB to its final decision was 10.6 working days. The range was between 1 and 31 working days³.

³ In *calendar* days, the average was 16 days with a range of 1 to 44 days.

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- Four applications required neither minor nor substantial changes. For these applications, the average decision time was five working days.

Minor and Substantial Concerns and Communication Channels for Resolution

- Eight of the twelve applications presented minor concerns that were dealt with by the REB administrator contacting the researcher or the first REB administrator directly. A common concern was the need to include local, site-specific contact information on the informed consent form. In one or two cases, additional documentation (e.g., inclusion of consent forms; application to the first REB) or information (e.g., definitions of terms, more information about study processes) was required.
- Substantial concerns were identified for one application; these were resolved with REB administrator-to-REB administrator and REB-to-researcher communication. This instance also resulted in changes being made to the original application.

REB administrators agreed that the communication channel of REB administrator-to-REB administrator via phone or e-mail works very well. These are the same methods used for REB administrator-to-researcher communication.

None of the applications included in the pilot presented concerns requiring higher-level, chair-to-chair communication for resolution. The administrators noted the need for such communication is rare.

Nature of Delays in REB Approval Decisions

In all instances, delays in approval decisions were the result of REB requests for revisions or additional documentation and the associated response times from researchers or sponsors.

Researcher and Study Coordinator Perceptions

The three researchers/study coordinators who agreed to be interviewed for the pilot reported that the reciprocal review process was faster than the first REB review. Comments included,

“Although the first REB process took some time, the second review was a pretty easy process... some minor changes were required – putting letters onto local letterhead...but it wasn’t onerous and the approval was quick.”

“I had no issues with [the process] ... it was faster than an initial review.”

“Everything was very smooth ... I was quite impressed with the speed of processing the application ... it was relatively painless.”

By e-mail, the fourth researcher/study coordinator noted,

“The reciprocal process was relatively straight forward, and the communication with the REB here was, as usual, very good. The REB has been very good at responding to questions and helping to make the ethics [review] a smooth process.”

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Efficiencies created via reciprocal review

Three of the researchers/study coordinators noted that the second REB review was quicker than the first REB review. They were appreciative of this more efficient process and had no suggestions for improvement in this regard.

Working relationships with REB administrators

All four of the study coordinators/researchers contacted spoke highly of the REB administrators, finding them to be helpful, knowledgeable, and pleasant to work with.

Availability of information about the reciprocal review process (general and application-specific)

One interviewee reported difficulties in finding guidance about the reciprocal review process on the web. S/he had been looking for information about how the reciprocal review process works, where to submit amendments, and which REBs are part of the process. However, upon contacting the REB administrator, a quick response to these queries was provided.

Another noted s/he received no feedback once the application was submitted through the University of Alberta's (UofA) HERO system – that is, no confirmation that the application had been received or reviewed. However, it became apparent that this person also hadn't understood the communication process regarding the application. S/he recalled seeing a notification on the HERO system that a University of Alberta e-mail address had been provided, but didn't realize s/he needed to access that address in order to receive communication about the application.

In discussion of this matter during the May 10 REB administrator meeting, one administrator noted that many non-UofA researchers do not understand the HERO system, what the electronic process is and the communication methods for them to move their approved application forward for review by the UofA's HREB. Representatives from the UofA said they are very willing to facilitate this process and suggested that researchers submitting to HERO should contact them directly using phone or e-mail. It was also noted that when researchers submit through HERO, they receive and must communicate with UofA ethics via a UofA email addresses or by accessing the HERO system.

Other Feedback and Suggestions for Improvements to the Reciprocal Review Process

Removing a step in the review process

In each of the two draft process maps, a step was included for the second REB to notify the first REB of its approval decision. The pilot revealed that not all REBs were including this step. At the May 10 meeting, REB administrators expressed mixed opinions about the value of this step. Some said the step serves no purpose and that it requires extra work on their part that is of little value. If there were significant concerns with the ethics application, they noted, communication between the REB chairs would be required for resolution. In this case, it would be known whether or not the second REB approved the study and with what changes.

On the other hand, others noted this is indeed an important step which helps to close the communication loop and ensure all parties are informed about the outcome of the second (and subsequent, if additional REBs are involved) review.

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Altering another step in the process

The draft process maps also indicated that it would be the first REB that would submit the ethics application package to the second REB. However, in actual practice, this rarely occurred. Instead, researchers/study coordinators were asked by the first REB to submit their application to the second REB. This was necessary for submission through the HERO system as the researcher/study coordinator is required to fill some mandatory fields, and then append the application and approval from the first REB. Since all REBs will ultimately be on the HERO or IRISS system, it may be wise to continue this practice. In addition, having researchers/study coordinators submit the application to the second REB may enhance their engagement in, and control or shepherding of the process, while ensuring a direct communication channel is opened between the researcher/study coordinator and the second REB.

The pilot process should be considered “completed”

There was consensus among the REB administrators at the May 10 meeting that the Reciprocity Pilot should be considered “completed”. They further confirmed that when they have a reciprocal review application, they will use the reciprocal review processes as piloted, but with the amendments noted above. Given the small number of cases reporting during the Pilot, they recommended a review of the processes again within a year.

Training for researchers/study coordinators

At the May 10 meeting with REB administrators, there was also discussion as to whether training for researchers/study coordinators about requirements for multi-site applications could assist in reducing the numbers of changes and edits required to ethics applications. Information about the responsibilities of the researcher/study coordinator and how to fulfill those responsibilities is required, for example. The administrators noted, however, that the greatest benefit will be realized when all REBs are using a common electronic platform (i.e. HERO or IRISS) which is anticipated by June 2013.

Other delays in the research administration process – operational approvals

It was noted by REB administrators that gaining operational approval from the five zones in Alberta Health Services often results in significant delays in being able to commence research. Currently the Alberta Health Services (AHS) zones have significantly different approaches to establishing this approval. Linda Barrett-Smith noted during the May 10 meeting that AHS recognizes this and is working to address the problems.

ACREC – UofA Reciprocity

The Alberta Cancer Research Ethics Committee (ACREC) of Alberta Health Services has a full reciprocity agreement with the University of Alberta, where the approval of ACREC applications is accepted and noted for record. Applications that involve University of Calgary sites and/ or faculty are reviewed by CHREB, usually via a delegated review. These processes do not impact those used for the multi-site reviews in other instances.

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Discussion

Removing notification of the first REB by the second REB of its decision

Given the different positions of REB administrators regarding the value of having the second REB notify the first of its decision, the HREH Project Support Team revisited the Reciprocity Agreement and was reminded that the intent of Section 8(3) is to ensure communication of all important matters among all REBs to whom the application is made. Clauses (a) and (b) of Section 8(3) are required to ensure that all REBs know of concerns and of the decision. This is particularly salient when an application is made to more than two REBs. It also ensures that, if the second or receiving REB has no concerns that the first REB is nevertheless formally informed about the receiving REB's decision.

For this reason, the notification step of the process for both health research and clinical trials has been retained. As the HREH moves forward and all REBs are on an information platform, it may be possible to build in an automatic notification function through which all REBs are electronically notified of any important issues raised and of each REB's approval decision. This would address REB administrator concerns about time and workload.

Transparency of the reciprocal review processes

The piloted reciprocal review processes for health research and clinical trials appear to be clear and transparent to REB administrators and chairs. The processes were relatively clear and "user friendly" to researchers and study coordinators, although some did express a desire for more readily available information on the internet. This information could be presented on a general human health research ethics information website. It is important to note here that feedback was received from only a handful of researchers/coordinators. More information about their perceptions and experiences would enrich the Pilot findings and future assessments of the processes.

Streamlining, efficiency and workload

In terms of streamlining and efficiency, the reciprocal review processes that were piloted appear to be effective in completing multi-site ethics application more quickly (versus the previous practice of full review processes for each REB of a multi-site study). Only minor revisions to the process were recommended by the REB administrators; none were requested by the small number of researchers/study coordinators who provided feedback. Efficiency could be further improved if the number of applications requiring modifications was reduced, since all delays in the cases reviewed for the Pilot were due to REB requests for changes and the time taken for researchers to address these requests.

Communication channels

Except for the one researcher/coordinator who wasn't aware s/he had to communicate with the UofA HREB via HERO or a UofA address, no concerns about communication channels surfaced during the Pilot. Researchers/coordinators agreed that REB administrators were very responsive and helpful. REB administrators agreed that phone or e-mail communications amongst themselves and/or with researchers/coordinators were effective for addressing minor and substantive concerns. No need for chair-to-chair communications arose during the pilot period.

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Volume of reciprocal reviews

Overall, the number of reciprocal reviews completed annually across the six HIA-designated REBs appears to be relatively small in number – somewhere around 30 to 35. This is important new information, since little baseline information was previously available. Once the HERO and IRISS systems are both in operation, it will be much easier to track the actual number of reciprocal reviews being conducted, and to observe trends – that is, whether the number of reciprocal reviews (which are indicative of the number of multi-site studies being conducted in Alberta, a desired outcome of the HREH) is increasing or decreasing over time.

Value of metrics for ongoing learning and improvement

Tracking of pre-specified dates and timelines associated with the piloted reciprocal review process enabled understanding of where delays occur as the ethics application moves through the reciprocal review process. This tracking shows promise for use in ongoing monitoring and generation of information that REBs can use to assess their performance, determine causes for any delays, and address these, thereby improving the process. Capturing this information at an aggregate level will also provide information about human health research ethics review processes and activities at a provincial level.

Recommendations for Moving Forward

Based on the findings reported above, and keeping in mind the limited data upon which they are based, six key recommendations regarding the review of human health research ethics applications requiring approval by more than one HIA-designated REB in Alberta are as follows:

1. The piloted reciprocal review processes should be adopted as the provincial processes for the review of multi-site ethics applications (“reciprocal reviews”), with one minor revision:
 - Changing the agent responsible for submitting the ethics application to the second and subsequent REBs. While the pilot processes indicated the first REB would submit to the second, it is recommended that the researcher/study coordinator be the agent who submits the application to the second and subsequent (if applicable) REBs for review.

The procedure for multi-site reviews thus should be as follows:

- The first REB will receive and review the application as per the usual process.
- Once approved, the researcher will forward the approved application and supporting documentation, including the approval letter/certificate, to the subsequent REBs. The researcher must let the subsequent REB administrator(s) know the protocol has been approved by one of the six HIA-designated REBs as that will, under the reciprocal process, permit this protocol and application to be reviewed as a delegated review.
- The subsequent REB administrator(s) will review, as per normal process, for any missing documents or required information. When the application package is complete, the administrator will forward to the chair or delegate for a delegated review.
- If there are minor concerns, they will be dealt with directly with communication between the subsequent REB and the researcher.
- If the concerns are more substantial they will be addressed through chair-to-chair communication.

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2. While the piloted reciprocal review processes appear to have reduced time and workload for researchers and REBs, greater efficiencies could be achieved by reducing the number of deficiencies in application packages that are forwarded to second REBs for reciprocal review. It is recommended that a strategy be developed for tracking the most frequent reasons why reciprocal review applications are returned to the researcher/study coordinator for modifications. The information generated could then be used to develop training/educational information and tools (e.g., web-based information) that will provide guidance to researchers and help them to submit a complete application package for initial and reciprocal ethics review. Topics might include:
 - General information – e.g., the Reciprocity Agreement and its associated processes, how to move one’s application forward from first REB review to second and subsequent REBs;
 - Specific instructions – e.g., ensuring that local contact information is included on the informed consent form; and,
 - Contact information and communication channels (e.g., if submitting to HERO, communications will be via a University of Alberta e-mail address or through HERO).
3. Research sponsors should be informed that when conducting multi-site studies in Alberta, once the first study site has completed the ethics review process, under the Reciprocity Agreement, the same study conducted in other sites is eligible for delegated review.
4. To support ongoing learning and improvement, the development of performance metrics for ethics review processes – by REB and for the province as a whole – is recommended. For individual REBs, this would allow determination of where delays in the process might be occurring, and how to address them. At a provincial level, with aggregated data from the six REBs, it would be possible to demonstrate the efficiency of human health research ethics review processes in the province to existing and prospective researchers and research sponsors. Recommended data collection points include:
 - Enactment of Reciprocity - % multi-site ethics applications in which second/subsequent REB reviews are delegated [or the opposite – the number which go to full review by the second or subsequent REB] (quarterly and/or annually)
 - Application approval timelines - single REB reviews
 - Date of REB receipt of application
 - Date application deemed complete
 - Date of REB meeting to review application/date of delegated review
 - Date returned to researcher for amendments (if applicable)
 - Date returned to REB
 - Date of REB review
 - Date of final REB decision
 - Date researcher notified

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- Application approval timelines - reciprocal reviews
 - Data for first REB review (as above), PLUS
 - Date application received by second REB
 - Date application deemed complete by second REB
 - Date review completed
 - Type of review (full, delegated)
 - Date returned to researcher for amendments (if applicable)
 - Date returned to REB for review
 - Date of REB review
 - Date of final REB decision
 - Date researcher notified

- Total time from application submission to REB decision (for single and multiple REB reviews)

It will be crucial, however, to ensure that all participants agree upon how these dates are defined and how the data is collected. For example, what constitutes “REB approval decision” – the date the delegated reviewer notes approval of the application, or the date that the application is presented at the REB meeting, or the date that the applicant is notified of the decision? Failure to agree on a common definition will yield data that is not comparable. Agreeing on definitions and how data will be collected is particularly important (and timely) as the University of Calgary rolls out the IRISS system for human health research ethics applications. It will be crucial that the same data is collected in the same manner in both the HERO and IRISS systems.

It will also be important to take into account the multiple factors that contribute to longer approval times, including, for example, the ethical complexity of the study under review, the quality of the ethics application when it is received, the capacity of the REB to conduct reviews (e.g. number and availability of reviewers, frequency of REB meetings) and other factors. The HREH Project Support Team has been advised by international expert Dr. Harold Pincus that mapping timelines without also assessing the complexity of the applications being reviewed will yield a limited understanding of review processes since a “faster” ethics review process may not always be a better one.

5. To further support learning and improvement, more effort is required to obtain researcher and study coordinator feedback regarding the reciprocal review process, and more broadly, the entire ethics review process. One approach would be to ensure that researchers/study coordinators automatically receive a feedback form once their ethics application process is completed. This approach could be expanded at a later date to generate other feedback relevant to the speed and quality of ethics review processes in the province.
6. A reassessment of the effectiveness and efficiency of the reciprocal review processes should be conducted in 12 to 18 months, following the migration of all REBs to a common electronic platform, and on an ongoing basis thereafter to determine the need for any revisions.

