

# Relying on an External/Central IRB: Recommended Workflow for the Duke IRB (iRIS) Submission Process

6Oct2025

Duke University Health System (DUHS) may rely on an external Institutional Review Board (IRB) - also known as a central IRB (CIRB), for review and approval of human subjects' research. At present, the commercial IRBs we most frequently work with are Advarra (CIRBI) and WCG IRBs.

DUHS may also rely on the IRB of another institution (single IRB or sIRB) when federal funding mandates use of sIRB. This tipsheet is primarily for use of a commercial central IRB although many of the steps are similar.



## Background and Significance

In the past few decades, multicenter trials have replaced single-center studies as the norm, mainly due to the scientific rigor and external validity required to support widespread changes in clinical practice. Improving clinical trial efficiency has been a common goal among research organizations, and much attention has been specifically focused on multicenter clinical trial start-up periods.

The use of a central IRB is one method for increasing multicenter trial efficiency (i.e. reducing time spent) during the start-up phase.

For multicenter studies, the central IRB is the IRB that conducts reviews on behalf of all study sites that agree to participate in the centralized review process. For participating sites with local IRBs, the central IRB would work with the individual institutions' IRBs to define the review responsibilities between local IRBs and the central IRB (21 CFR 56.114).

Centralization of the IRB process requires resources for managing submission to the CIRB while also meeting the remaining human research protection program (HRPP) review requirements at each participating site. Please note: The federal Office for Human Research Protections (OHRP) governs this and all IRBs must obtain an FWA: <https://www.hhs.gov/ohrp/register-irbs-and-obtain-fwas/fwas/index.html>.

Effective communication and coordination are key to a successful partnership between local and central IRBs. Researchers and institutions must work closely with both entities to ensure that all regulatory requirements are met and that any changes or issues are promptly addressed. In our case at Duke, our local IRB is the Duke University Health System Institutional Review Board (DUHS IRB).

While local IRBs retain responsibility for certain aspects of study conduct, such as site-specific recruitment, participant interactions and conflict of interest for investigators, central IRBs provide guidance and oversight throughout the research process. This collaboration allows for the efficient conduct of multi-site studies while maintaining high ethical standards.

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6Oct2025

## CIRB Submission Process

### 1. Determine Eligibility and Initiate Reliance Agreement

After you have determined from the [DUHS External IRB Policy](#) that your study meets the criteria to allow the use of an external IRB, obtain the external IRB's reliance agreement. The reliance agreement could be in the form of an IRB Authorization Agreement (IAA) or if the external IRB is signed onto the SMART IRB Master Reliance Agreement, please reach out to the external IRB and ask how they would like to proceed (using the SMART IRB online reliance system, SMART IRB cede letter or IREx).

Note: DUHS IRB's FWA number is FWA00009025

Here is a list of [Participating Institutions](#) that have joined SMART IRB and may use the SMART IRB Agreement to enable IRB reliance.

For commercial IRBs such as WCG and Advarra the IAA is used (not the SMART IRB Master Reliance Agreement). An example of the Advarra IAA template is below and you can find the IAA templates for Advarra and WCG on the DUHS IRB [website](#).



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Columbia, MD 21044  
410-884-2900

#### Institutional Review Board (IRB) / Independent Ethics Committee (IEC) Authorization Agreement

Name of Institution or Organization Providing IRB Review: Advarra, Inc. ("Advarra IRB")

Advarra IRB Registration #: IRB00000971

Advarra IRB Federal Wide Assurance (FWA) #: FWA00023875

Name of Institution Relying on the Designated IRB (Relying Organization): Duke University Health System (DUHS)

(check one):  Institution B has an FWA. FWA #: 00009025

Institution B does not have an FWA.

The Officials signing below agree that (Relying Organization): Duke University Health System (DUHS) may rely on the reviewing IRB for review and continuing oversight of its human subjects research described below (check one):

This agreement applies to all human subjects research at the Relying Organization.

This agreement is limited to the following specific protocol(s):

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6Oct2025

## a. Draft Site-Specific Consent Form

If proceeding with the IAA, once you receive the central IRB master ICF templates, apply site specific information and DUHS IRB standard language via tracked changes. The CRO/sponsor must approve site edits prior to Duke IRB submission, so this should be begun and resolved as soon as possible so as not to hold up the initial Duke IRB Submission and IAA resolution.

## 2. Submit New Study Application in iRIS

Before the IAA can be signed by the DUHS IRB, the Duke study team must complete and submit a New Study Application in iRIS and choose the external IRB pathway in the "Protocol Application Type" section. This ensures that the DUHS IRB has enough information to assess whether to cede or not, and to begin the process of obtaining ancillary reviews (for example, CRU and applicable specialty committees). Include available documents at this point, but aside from the ICF (and a version of the Study Protocol document, and generally the IB), do not hold this submission while awaiting all documents from the Sponsor. Those not included here can be added at step 7.

Outstanding Submission(s)			
Track Location	Ref Number	Request Type	Process Submission
	Pro00115548-INIT-1.0	Click on the hyperlink to edit/view the submission.  <b>Initial Review Submission Packet</b>	<b>Send Submission</b>

## 3. Forward IAA Agreement to Minna Pak

Forward the agreement with study specific information by email to Minna Pak ([minna.pak@duke.edu](mailto:minna.pak@duke.edu)) for review by Duke. If acceptable, the DUHS IRB will sign the reliance agreement and return it to the Duke study team to facilitate the full execution by the external IRB. Additional information regarding this step can be found at: <https://irb.duhs.duke.edu/duhs-irb-reliance-external-irb>

## 4. Create Site/Investigator Submission with External IRB

Add Site/PI to CIRB by creating a new investigator application. You may need to create an account/register to obtain appropriate access to the CIRB in order to make and edit submissions and respond to IRB queries (manager access). The CRO can also assist with providing the Tracking ID which enables you to create the site application under the existing sponsor protocol.

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6Oct2025

**CIRBI** Center for IRB Intelligence

## Creating New Site Submission

Lead In / Confirmation Page

\* To confirm you have accessed the correct form, please select one:

- I am a clinical research site that is joining a multi-site study for which Advarra IRB will act as the central IRB. The Sponsor or CRO has or will submit the protocol.
- I am a clinical research site, institution, academic medical center, hospital, government agency, non-profit organization, or contractor/CRO that is submitting a single investigator study.
- I am a pharmaceutical Sponsor or CRO who will be conducting a multi-site study for which Advarra IRB will act as the Central IRB. I am submitting the protocol on behalf of all sites.

[Clear](#)

## 5. Duke CRU and Specialty Committee review, through Modification Request

When CRU and Specialty Committee review is completed, initial IRB review will begin and then the application will be returned to you as a Modification Request. As part of CRU and Specialty Committee and preliminary IRB review, if additional ICF changes are requested (ex. Pregnancy Committee), please resolve those changes including Sponsor re-approval before proceeding.

## 6. Submit Site Application and Documents to External IRB

Waiting until this point (after initial Duke IRB review, through the Mod Request) to submit your CIRBI application ensures that all ancillary reviews have been done and Duke-requested changes (if applicable) are incorporated into the consent form or other documents prior to submitting to your external IRB for approval.

## 7. Obtain then upload External IRB Approval into iRIS

Once the external IRB's approval has been obtained, upload the following documents into your submission via the pending Mod Request in iRIS:

- Duke-specific approved consent form and other remaining documents approved by the external IRB (including but not limited to revised study protocol, investigator's brochure, recruitment and patient facing materials)
- Applicable fully signed reliance agreement
- IRB approval notice from the external IRB—approving the Duke site



Certificate of  
Action

INVESTIGATOR APPROVAL

Then otherwise complete and submit the modification response in iRIS.

# Relying on an External/Central IRB: Recommended Workflow for the Duke IRB (iRIS) Submission Process

6Oct2025

## 8. DUHS IRB Administrative Review

The DUHS IRB will complete its administrative review within 2-3 business days of receipt. Once the administrative review is complete and the study acknowledged, the administrative approval will be sent to Oncore. The DUHS IRB will not watermark the consent form(s) and upon the study being administratively acknowledged, the ICF must be manually added to OnCore (see tipsheet [here](#)). The expiration date in iRIS will be set to match the external IRB's expiration date.



### DUHS INSTITUTIONAL REVIEW BOARD NOTIFICATION OF ADMINISTRATIVE REVIEW

**Please note that Institutional Approval (which occurs in Oncore) must be completed prior to recruiting any potential participants.**

## References

<https://pmc.ncbi.nlm.nih.gov/articles/PMC7236440/>

[https://irb.duhs.duke.edu/sites/default/files/2024-02/reliance\\_on\\_external\\_irbs\\_11-20-2023.pdf](https://irb.duhs.duke.edu/sites/default/files/2024-02/reliance_on_external_irbs_11-20-2023.pdf)

<https://irb.duhs.duke.edu/duhs-irb-reliance-external-irb>

<https://www.lindushealth.com/blog/comparing-local-irbs-and-central-irbs-a-comprehensive-guide>

[https://www.fda.gov/regulatory-information/search-fda-guidance-documents/using-centralized-irb-review-process-multicenter-clinical-trials#\\_Toc128900335](https://www.fda.gov/regulatory-information/search-fda-guidance-documents/using-centralized-irb-review-process-multicenter-clinical-trials#_Toc128900335)

## FAQs

1. **Do I need to submit everything to both IRB's (recruitment documents, PRO's, surveys, etc)?** Yes. Everything submitted and approved/acknowledged by the Central IRB should then be submitted to the Duke IRB, in a timely manner. All documents for use by your site should complete Duke IRB approval/acknowledgement, prior to use.

## Relying on an External/Central IRB: Recommended Workflow for the Duke IRB (iRIS) Submission Process

6Oct2025

2. **Are all the KSP listed in the CIRB application?** No, only personnel who need access to the study within the CIRB portal to review and/or submit study documents. This is usually the coordinator team (CRCs and Reg), the PL/PM and PI. The person completing the application defines the access of others to view or edit a study or site for that specific protocol or site submission.
3. **Does the PI need to have an account with the CIRB?** Yes, the PI must have a user account with the CIRB for access to the study and in order to receive CIRB notifications. If the PI does not have an account, follow the registration instructions on the CIRB application website to add the PI.
4. **How long does initial CIRB review typically take? Amendments?** For a submission to add your local site to an existing approved protocol, assuming it goes through cleanly (minimal modifications), we estimate 2 weeks or less. Depending upon complexity of the amendment submission, these are often approved in around 1 week.