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How to Respond to a Clarification Request During Initial Local Context Review of External IRB Studies

When relying on an External IRB, the UVM IRB needs to conduct local, institutional reviews in UVMClick prior to releasing approval to begin local research activities (see "How to Request Reliance on an External IRB" <u>user guide</u>). The required documentation will be requested through a clarification as needed. The PI/Contact/Proxy will receive an email notification from the IRB Reliance Administrator asking for changes to the Click smart forms or submitted documents.

How do you know that the UVM IRB is waiting for a clarification?

The PI (and any assigned proxy or contact) will receive an email notification requesting the required clarifications. An example of that email is below.

	Notification of Requested Clarifications
То:	Jane Doe
Link:	STUDY00000036 Click here to open the study/protocol
P.I.:	John Smith
Title:	Cure for the Common Cold
Description:	Clarifications have been requested on this submission. This requires a response from you. For additional details, click on the link above to review and provide clarification.

The submission will also appear in your "Dashboard > My Inbox" with a status of Clarification Requested or Modifications Required, and the step of review. An example is shown below.

>> Dashboard Agr	eements	COI	Facilities	Grants	IACUC	IRB	•••
							😮 Help
Create 💌	My Inbox	My Reviews					
Recently Viewed	My Inbox					/	
	Filter by 🕼	D	 Enter text to 	search for	Q]	+ Add Filter X Cle	ar All
STUDY00002130: External Test Study	ID	Name	Date Created		State	Coordin	ator
STUDY00002128: Test Study	📥 STUDY	00002127 Extern IRB	al 10/21/2022 8:2 AM	8 11/14/2022 12:07 PM	7 Clarification Reque (Pre-Review)	ested Jennifer Dulin	
STUDY00002124: Example	1 items		∢ pa	ge 1 of 1	•	25 / pa	age

- Click on the study hyperlink. Depending on your login status at the time, the system may require your UVM NetID/password login credentials.
- The submission will appear with a status of Clarification Requested or Modifications Required, along with the step of review. The example below shows Clarification Requested during Pre-Review.

Clarification Requested (Pre- Review) Entered IRB: 10/21/2022 11:41 AM Last updated: 11/14/2022 12:23 PM	STUDY000 Principal investigator: Lead principal investigator Submission type: Primary contact: PI proxies: PI proxies (Lead site):	John Smith	rnal IRB		IRB office: CHRMS IRB coordinator: Jennife External study ID: 123456		
Next Steps	Submitting Department: Me	d-General					
Edit Study	Initial Review Level:						
Printer Version	History Funding	Contacts Training	Documents	Sites	IRB Assignment Details	Reviews	Snapsl
Assign Coordinator					_		
🛃 Assign Primary Contact	Filter by O Activity	Enter text to sea	arch for	٩	+ Add Filter X Clear All		
🏭 Assign PI Proxy	Activity		Autho	or		 Activity Date 	
Manage Ancillary Reviews	 Clarification Reque 	ested	Dulin,	Jennifer Ar	nne	11/14/2022 12:23	PM

To Respond to Request for Clarifications

1. On the History tab, you will see a recent entry that says "Clarification Requested" or "Letter Sent" or "Required Modifications Reviewed". Directly underneath, you will see review comments and/or attached files (blue hyperlink with document title, see below). Review the comments and the content of any attachments (if applicable) for additional information or changes that are required.

****Tip**** If the clarification comments are longer than a few lines, you will see blue text in the bottom right corner that says "read more." Click on this link to expand the entry and see all required clarifications.

History	Funding	Contacts	Training	Documents	Sites	Reviews			
Filter by	Activity	▼ En	ter text to searcl	h for	٩	+ Add Filter	× Clear All		
A	tivity			Auth	or			 Activity Date 	
S CI	arification Requ	ested		Dulir	n, Jennifer An	ine		11/14/2022 12:23 PM	
Hello Dr. S	Smith,								
Please se	e the following c	larifications.							
Make all c	hanges to docu	ments using Tra	ck Changes, and	d upload revised v	ersions by hit	ting "Update" to	o the left of the p	previous version in Click.	
1) Study S	cope page, Que	estion 13: Please	and swer "yes"						
2) Local R	esearch Locatio	ns: Please add '	'Main Hospital/A	CC" to the list of I	ocations.				
3) Local S	3) Local Site Documents: Please upload your Consent Process Documentation form.								
		Please delete th external irb 10.2		al memo; we do no	t need appro	val memos f	read more 🔻		

2. Click the dark grey/blue button called "Edit Study" to open your editable smart forms.



Depending upon the requested change, you may be required to modify specific fields or upload documents.
 Tip When uploading any document:



Example: Other attachments:			
Other attachments:			
+ Add			
Document C	Category	Date Modified	Document History
There are no items to display			

4. Once you have edited the applicable fields, select "Save". Then select "Exit".



Important! The response has not yet been submitted back to the IRB for review. Comparing your Updated Submission to Previous Versions

1. To see the modifications made to your study please use the Compare function.



2. On the comparison page, you can select the previous version of the submission for comparison. The pencil icons will show which parts of the study have been edited.



3. Differences can be viewed by clicking on the pencil icon to take you to that section.



By clicking on the document history, you can compare document versions.

Title:	Human_Subjects_Protocol_Form_11.20.2020.docx							
File:	Human_Subjects_Protocol_Form_11.20.2020.docx							
Owner:	John Smith							
Author:								
Content Type								
Version:	v3							
Description:								
History:								
Compare	▼ Date	Version	Person	Action	Notes	Uploaded File		
Compare	 ▼ Date 10/12/2022 9:14 AM 	Version v3	Person John Smith	Action File Uploaded & Edited	Notes	Uploaded File Human_Subjects_Protocol_Form_11.20.2020.docx		
Compare					Notes	•		
Compare	10/12/2022 9:14 AM	v3	John Smith	File Uploaded & Edited	Notes	Human_Subjects_Protocol_Form_11.20.2020.docx		

4. To exit the comparison view, click EXIT on the bottom right-hand side of the screen.

Submitting the Clarification back to the RPO Office

5. Click the activity on the left that says "Submit Response" to send this submission back to the RPO Office for review and processing.



If there are any required fields that you forgot to enter, the Submit process will display them. You can use

the pop-up to Jump To those particular screens quickly and enter the missing data. Click on blue hyperlinks.

Error/Warning Messages		Re	fresh
Message	Field Name		Jump To
This is a required field; therefore, you must provide the required information.	Drug Involved		Study Scope
This is a required field; therefore, you must provide the required information.	Device Involved		Study Scope

NOTE: These Errors/Warning Messages only appear if required field entry was missed.

6. When submitting a response, you have the opportunity to optionally add notes and/or upload supporting documents (do not use this to upload documents required to be in the Smart Forms). These are not required fields. Clicking OK will remove this submission from your "My Inbox," and place it in the IRB Reliance Administrator's "My Inbox" for processing.

bmit Response				
	Optional			
2. Supporting documents	s: Optional	1		
Name There are no items to displa	ıy			
			ок	Cancel

Note: The status will change from "Clarification Requested" or "Modifications Required" to an IRB Review status.



Approval to Begin Local Activities

Once the IRB has all of the required documentation, including the site approval memo from the External IRB, approved local consent(s), and all local Ancillary Reviews are completed, you will receive a memorandum that states that you are approved to begin local activities and the IRB review status will be "Review Complete".