

data/biospecimens collected for the purposes of the study (i.e. primary analysis), select 'Not Regulated' and (in section 04-1) 'U-M not engaged.'

If U-M's activity in a study is limited to analysis of coded

preferable to select Secondary Research Uses.

1 of 3 5/16/2018, 3:32 PM

that have been coded before the

· Research Involving Deceased

 Pre-review of Clinical Data Sets Preparatory to Research

still exist.

Individuals Only

researcher receives them, but identifiers

 Standard Public Health Surveillance or Prevention Activities

IRB review is not required for the following activities, but researchers may wish complete this brief application to generate a determination letter for funding or publication purposes, or to request IRB review to confirm the "Not Regulated" determination:

- · Case Studies
- · Class Activities
- Journalism/Documentary Activities
- Oral History
- Quality Assurance and Quality Improvement Activities
- Research on Organizations
- Research using Publicly Available Data Sets

Activities such as training grants, program projects, center grants, or multi-phase studies not involving human subjects until later years. Before release of funding, some agencies may require IRB acknowledgement of the future use of human subjects.

These projects are sometimes referred to as "umbrella projects" or "dry applications."

Use of an investigational drug or biologic, outside of a clinical trial, under a single-patient IND issued by the FDA for a patient faced with a serious or life-threatening disease or condition.

 Contact the IRB Chair-on-Call as soon as possible once the decision to use the investigational drug or biologic is made.

- Submission for IRB review and approval is required, prior to use if feasible. If this was an emergency use, submit no later than five days after use of the investigational agent.
- This includes both one-time use and continuing therapy.

Use of an investigational device, outside of a clinical trial, when this is the only option available for a patient faced with a serious or life-threatening disease or condition.

- Contact the IRB Chair-on-Call as soon as possible once the decision to use the investigational device is made.
- Submission for IRB review and approval is required, prior to device use if feasible.
   If this was an emergency use, submit no later than five days after use of the investigational device.
- This includes both one-time use and continuing therapy.

Humanitarian Use Device (HUD) under a HDE

Projects lacking immediate

human subjects, their data,

plans for involvement of

Single-patient Expanded

Access Drug or Biologic

(Emergency Use or Non-

Single-patient Expanded

(Emergency Use or Non-

**Emergency/Compassionate** 

Access Device Use

**Emergency/Compassionate** 

and/or their specimens

Non-research, on-label use of an HUD under a Humanitarian Device Exemption (HDE)

Requesting Review by a Non-UM IRB Use ONLY to request deferral of IRB oversight for UM activities to a non-UM IRB.

Do not use Multi-site Research application type when U-M is **only** a performance site - select Standard application type.

Select when U-M is any of the following:

- Multi-site Research where U-M
  is a Coordinating Center and/or
  IRB of Record
- Data Coordinating Center;
- Clinical Coordinating Center; or
- IRB of Record for non-U-M sites (for U-M to be IRB of Record you must contact your IRB for prior acknowledgement).

When U-M is **also** a performance site, a separate application is required for local site

## Threatening Circumstances

• FDA Expanded Access (including nonemergency single-patient use)

## **Humanitarian Use Device (HUD)**

A HUD is a device that is intended to benefit patients in the treatment and diagnosis of diseases or conditions that affect or is manifested in fewer than 4,000 individuals in the United States per year.

- For clinical care use of a HUD under an HDE# (Humanitarian Device Exemption) where the HDE holder will <u>not</u> collect safety and effectiveness data to support a Premarket Approval (PMA) application complete the "Humanitarian Use Device" Application.
- For clinical care use of a HUD under an HDE# (Humanitarian Device Exemption) where the HDE holder will collect safety and effectiveness data to support a Premarket Approval (PMA) application complete a
- Standard Application.
   For emergent use or off-label use of an HUD that has received approval under a Humanitarian Use Device application at UM, no to the approved HUD workspace and
- Humanitarian Use Device application at UM, go to the approved HUD workspace and complete an ORIO 'Report to Oversight Entity' submission.
- For emergent use of an HUD that is not previously approved under a Humanitarian Use Device application at UM, complete the "Emergency one-time use of an investigational or unapproved device" application.
- For investigational, off-label use of a HUD submit a Standard Application (and an Investigational Device Exemption (IDE) application to the FDA).

2 of 3 5/16/2018, 3:32 PM