Indian Council of Medical Research

ICMR Bioethics Unit

FREQUENTLY ASKED QUESTIONS (FAQs)

On

OPERATIONAL GUIDELINES FOR SINGLE ETHICS REVIEW OF MULTICENTRE RESEARCH IN INDIA

2026

1. **What is multicentre research?**

   Multicentre research involves conducting a study across multiple institutions or sites using a common protocol to address shared research questions.

2. **What is single ethics review in multicentre research?**

   Single ethics review in multicentre research refers to the delegation of the responsibility for ethics review of all participating sites to a Single Ethics Committee (Single EC) located at one mutually agreed-upon study coordinating site among all the participating sites.

3. **Which types of research are covered under the ICMR Operational Guidelines for Single Ethics Review guidelines**?

   The guidelines apply to all types of multicentre biomedical and health research in India.

4. **Are the ICMR Operational Guidelines for Single Ethics Review of Multicentre Research in India applicable to regulatory clinical trials?**

   The applicability of these guidelines to regulatory clinical trials is subject to the requirements outlined in the Drugs and Cosmetics Act, 1940 & New Drugs and Clinical Trial (NDCT) Rules, 2019 & other applicable regulations. At present, these guidelines apply to non-regulatory biomedical and health research.

5. **Can non-regulatory clinical trials be conducted under the single ethics review model?**

   Yes. Non-regulatory clinical trials as well as other biomedical and health research studies can be reviewed under the single ethics review model.

6. **How is the Coordinating Principal Investigator (c-PI) decided?**

   The Coordinating Principal Investigator (c-PI) for a multicentre research study is decided by mutual agreement among the participating sites. In sponsored multicentre research, the c-PI must be identified either by the investigators themselves or by the sponsor. The responsibility for overall coordination of the ethics review lies with the c-PI.

7. **What are the essential eligibility criteria to become a Single EC?**

   - EC has a meeting calendar and meets regularly (preferably once a month).
   - It has valid registration with the Department of Health Research (DHR) and/or the Central Drugs Standard Control Organisation (CDSCO), as applicable, through Naitik or Sugam portal.
   - EC members are well-trained and updated in ICMR National Ethical Guidelines, EC SOPs, GCP Guidelines, NDCT Rules and other relevant guidelines and regulations, as applicable.
   - EC demonstrates capacity for undertaking an efficient and timely ethics review, which is independent as well as competent.

- It possesses a dedicated EC office and a secretariat with staff, having defined roles and responsibilities for communication and administrative actions.

8. **Is there a 50 km radius requirement for designating a Single EC under the single ethics review model?**

   There is no geographical distance requirement for designating a Single EC. It is selected based on eligibility criteria and mutual agreement among the participating sites.

9. **If an Ethics Committee agrees to serve as the Single EC, will this designation imply that the Ethics Committee has regulatory or supervisory authority over the Ethics Committees at participating sites?**

   No, the designation of a Single EC is a functional arrangement intended to facilitate efficient, consistent, and harmonised ethics review for multicentre research and does not confer any superior status or authority beyond the scope of its assigned review responsibilities. Similarly, the designation of c-PI is a functional arrangement to facilitate a single ethics review.

10. **Can an independent Ethics Committees serve as a Single EC?**

    Yes. An independent Ethics Committee (EC), without any institutional affiliation, may serve as the Single EC, provided it fulfils the essential eligibility requirements and demonstrates the capacity to undertake a robust and independent scientific review process before conducting the ethics review.

11. **What happens if the Ethics Committee at the coordinating site is eligible to serve as the Single EC but is unwilling or unable to undertake the responsibility?**

    In case the EC at the study coordinating site does not meet the eligibility criteria, or it is unable to take up this role, another eligible and willing participating site EC may be identified by investigators to undertake the single ethics review, and accordingly, a change in c-PI would facilitate overall study coordination amongst sites and with the Single EC.

12. **If there is no coordinating site and multiple Ethics Committees are equally eligible to serve as the Single EC, who decides which Ethics Committee will undertake the single ethics review?**

    If there is no coordinating site and more than one EC meets the eligibility criteria to serve as the Single EC, the site PIs shall arrive at a mutual agreement to designate the Single EC from amongst all the suitable/ eligible ECs, and the participating site would become the coordinating site, and the PI shall be designated as c-PI.

13. **Is it mandatory for all participating sites to have a registered Ethics Committee under the single ethics review model?**

    The eligible participating site's Ethics Committee that serves as the Single EC must be duly registered with DHR and/ or the CDSCO, as applicable, through Naitik or Sugam portal. Other centres without an Ethics Committee including those in rural or underserved areas or there who do not have a registered EC also participate in multicentre research under single ethics review model.

14. **Can an eligible Single EC decline to undertake the ethics review of multicentre study?**

    The selection of Single EC has to be with mutual agreement. In case the Single EC is unwilling to take up the role, investigators may identify another eligible and willing participating site Ethics Committee to undertake the single ethics review. Accordingly, a change in the c-PI may be required to facilitate overall study coordination among the participating sites and with the Single EC.

15. **Can a sponsor adopt a hybrid ethics review model for a multicentre study, where some participating sites are reviewed by the Single EC while others continue to obtain approval from their respective institutional Ethics Committees?**

    No, under single ethics review model, only the Single EC undertakes the comprehensive ethics review of the multicentre research protocol. Upon satisfactory review, the Single EC would grant an ethics approval, which would apply to all participating sites of multicentre research.

16. **What are the specific protocol requirements for single ethics review?**

    The multicentre protocol should outline clear plans for

    a. Site-specific ethical considerations from all participating sites, including participant protection measures, language adaptations in the consent process, and community engagement strategies
    b. Coordination and communication among participating sites to address contextual, cultural and operational variations.
    c. The protocol must include a list of all participating institutions and investigators, along with their names and contact information.
    d. Framework for governance, operations and coordination across sites.
    e. Additional budgets related to scientific review, single ethics review, additional manpower or support, for review, communication and networking among sites.

17. **Which Ethics Committee is responsible for ensuring that site-specific recommendations are implemented?**

    The Single EC is responsible for ensuring that site-specific recommendations are implemented.

18. **How can site-specific issues be adequately addressed under a single ethics review framework?**

    The multicentre study protocol must include a dedicated section describing the local relevance, site-specific ethical considerations, participant protection measures, language adaptations in the informed consent process, and community engagement strategies for each participating site. The c-PI should harmonize inputs from all participating sites into the common protocol. The Single EC reviews these site-specific considerations and, where necessary, may seek inputs from community representatives, subject experts, independent consultants, or the Member Secretary of the local Ethics Committee. The Single EC may also recommend risk-based monitoring, centralized documentation, and, wherever required, include site-specific conditions and recommendations in the approval letter, such as participant recruitment, informed consent, additional safeguards for vulnerable persons, and other site-specific considerations, to ensure consistent, accountable, and context-sensitive ethical oversight.

19. **What are the documents that need to be submitted by the c-PI to the Single EC?**
    The following documents need to be submitted:
    - Initial Review Form for single ethics review (with site information, roles and contact details).
    - Multicentre research protocol (with version No. & Date) including names, affiliation and contact details of all participating sites.
    - Protocol providing ethical considerations highlighting local and site-specific issues and additional safeguards.
    - Informed consent documents, including English Master ICF and PIS
    - Site-specific/ translated versions of Informed consent documents and advocacy material.
    - Community engagement plans at participating sites (if any).
    - CV and relevant training certificates of all PIs and Co-PIs.
    - Data management, communication, networking, budget, MoU/MTA etc.
    - Peer review/ Scientific Committee approval with comments.
    - Conflict of interest declarations from all investigators (if applicable).
    - Authorship, publication, dissemination plan, access and data sharing.
    - Checklist of applicable regulatory/ administrative requirements.
    - Any other relevant documents, as applicable.

20. Is prior scientific review a mandatory requirement for conducting a single ethics review?

Multicentre research studies require a prior scientific review, which may be conducted at the coordinating site or, if not feasible, at another participating site. The scientific review may be conducted by an institutional scientific committee or an independent expert group. Alternatively, a peer-review process may be used to undertake a comprehensive and independent scientific review.

21. Does the multicentre study protocol need to undergo scientific review at every participating site?

Under the single ethics review guidelines, only one scientific review is required for the multicentre study. Separate scientific review by each participating site is not required.

22. How should a multicentre study proceed if scientific review cannot be undertaken at the coordinating site?

Multicentre research studies require a prior scientific review at the coordinating site. If this is not feasible, the scientific review may be undertaken at another participating site.

23. If a multicentre study has already undergone scientific review by the funding agency or sponsor, is any further scientific review required?

Yes. The scientific review required under the single ethics review framework is separate from and in addition to the review undertaken by the funding agency or sponsor.

24. How should a Single EC assess the accuracy and appropriateness of site-specific local language translations of the informed consent document?

Primarily, this would be the responsibility of Single EC Secretariat to verify that the translated versions of ICD are appropriate and match the Single EC-approved English version of the document. Therefore, the Single EC Secretariat shall be required to engage with relevant language professionals, or other experts or independent consultants or the member secretary of the local EC to ascertain the quality of translations. They may alternatively seek back-translated versions in English for review, specifically where research is sensitive/ involves higher risk/ vulnerable persons or groups. If the Single EC has members who understand other languages, the translated versions may be reviewed by them.

25. How can a Single EC adequately assess site-specific ethical, cultural, or community concerns at participating sites, particularly in remote or underserved settings?

The Single EC should invest in extra efforts and time to ascertain that the study is relevant to the local population. Whenever necessary, the Single EC may decide to seek inputs through community representative(s)/ subject matter experts/ or consult the Member Secretary of the site EC to understand site-specific scientific, technical, or ethical issues.

26. Do participating site Ethics Committees have to be present when the Single EC reviews a multicentre research proposal?

No. Participating site Ethics Committees are not required to be present during the Single EC review.

27. Under the single ethics review framework, should study documents be submitted to the local Ethics Committee?

No, submission of study documents to the local Ethics Committee is not required.

28. What is the role of the local Ethics Committees when Single EC is designated for a multicentre research study?

The local ethics committee generally have no role in the single ethics review model. However, for studies with high-risk/ sensitive matters the Single EC may seek written comments or invite the Member Secretary of the local site EC/ and one-two site EC members to join the Single EC meeting online to provide their comments. Also, for the monitoring of high-risk studies or those involving vulnerable populations, significant societal concerns, media attention, or other relevant issues, the Single EC may coordinate with the site EC Member Secretary to plan and designate local Ethics Committee members for site visits.

29. Can the Single EC delegate some of its responsibilities to Local Ethics Committees when a multicentre study involves a large number of participating sites?

No. The Single EC cannot delegate its ethics review and oversight responsibilities to Local Ethics Committees. However, for high-risk or sensitive studies, the Single EC may seek written comments, invite local EC representatives to its meeting for site-specific inputs, or request the local EC to facilitate or conduct site visits for monitoring.

30. Is a separate ethics approval letter required for each participating site, or is the Single EC approval valid for all participating sites?

No. A separate ethics approval letter is not required for each participating site. The approval letter issued by the Single EC applies to all participating sites in the multicentre research study.

31. What information must be included in the Single EC approval letter for a multicentre study?

The approval letter must specify

a. List of all approved participating sites (with names of PI/ co-PI).
b. Names of sub-sites/field units involved.
c. Approved protocol (with version number and date).
d. List of all other approved documents such as the informed consent document or other study tools (stating version number and date).
e. Validity of the approval, conditions and suggestions.
f. Frequency of continuing review report, annual report submission requirements, among others.
g. Wherever necessary, the approval letter must provide site-specific suggestions on matters such as participant recruitment, informed consent process, additional safeguards for vulnerable persons, or other site-specific considerations (as applicable).
h. Approval letter must mention the ethics monitoring and oversight plan, either uniform across all sites or tailored to individual sites, detailing the frequency, scope, and reporting requirements for site-level oversight.
i. Any other as applicable

32. After receiving approval from the Single EC, how should the approval be communicated to participating sites?

The Single EC shall communicate the final approval to the c-PI, who in turn would communicate with the site PIs.

33. Can new participating sites be added to a multicentre study after the Single EC has granted approval and the study has started?

Yes. New participating sites may be added after the Single EC has granted approval and the study has started. Where the addition of new sites is anticipated, the research protocol should specify the plan and eligibility criteria in advance, and this will be reviewed by the Single EC during the initial ethics review. If the need to add new sites arises after study initiation due to reasons such as withdrawal of existing sites, protocol amendments, or other reasons, the c-PI must submit a justified request with the relevant details to the Single EC for consideration.

34. If all participating sites and their Ethics Committees are listed in the protocol, will the addition of a new site require a protocol amendment?

Yes. Additional study sites may be added after study initiation when justified. The c-PI must submit a request, with reasons and details of the proposed site, to the Single EC for review and approval

before the new site can initiate study activities. The Single EC secretariat must review the research and based on the research risks to participants decide regarding if research requires an expedited or full ethics committee review (if there is added risk).

35. How does the Single EC review a request to add new participating sites after study initiation?

The Single EC Secretariat may review whether any local factors or conditions at the proposed new sites could pose additional risks. It may also assess the requirements/ eligibility for the addition of new sites, along with timelines and decide if the addition of sites later would require a full or an expedited ethics review.

36. Who is responsible for monitoring and oversight of a multicentre study under single ethics review?

Single EC would be responsible for monitoring and oversight across all participating sites.

37. Can the monitoring and oversight requirements differ across participating sites in a multicentre study?

Yes, in determining the nature and intensity of monitoring across all participating sites, the Single EC shall consider all relevant risk categories, including physical risks arising from study procedures or interventions, as well as psychosocial risks such as stigma, emotional distress, breaches of confidentiality, or other potential social harms. Risk may differ at different sites and must be accordingly considered by the Single EC.

38. Is an MoU or NOC between participating institutions required to facilitate monitoring and oversight visits by the Single EC?

An MoU or NOC is not mandatory in all cases. However, participating institutions are encouraged to identify and implement measures to ensure mutual agreement on responsibilities as well as plan governance mechanisms. They may plan to have appropriate institutional arrangements, to facilitate monitoring and oversight activities by the Single EC.

39. How can the Single EC undertake the ongoing monitoring of all participating sites?

The Single EC undertakes ongoing monitoring of all participating sites by conducting continuing review at an appropriate frequency based on the level of risk (e.g., quarterly, biannually, or annually).

40. Can Single EC involve local site ethics committees for monitoring?

The overall responsibility for monitoring and oversight remains with the Single EC. However, for research involving a high degree of risk to participants or where there are heightened societal concerns, vulnerable persons, media reports, or other concerns, the Single EC may coordinate with the Member Secretary of the site Ethics Committee to plan and designate local Ethics Committee members to undertake site monitoring visits.

41. How is a Data and Safety Monitoring Board (DSMB) established and operated in a multicentre study reviewed through the single ethics review?

Based on the study design, risk profile, site characteristics, sponsor requirements, and participant safety considerations, the Single EC may determine the need for a DSMB and indicate this in the decision letter. The DSMB may accordingly be set up by the sponsor(s)/institution and its report be shared with Single EC through c-PI from time to time.

42. What is the process for reporting and reviewing Serious Adverse Events (SAEs) in a multicentre study approved by a Single EC?

All SAEs must be reported as per applicable timelines and reviewed by the Single EC in multicentre research. The site PI shall inform c-PI, who shall notify the Single EC and sponsor (if applicable) within 24 hours of becoming aware of the event. Further, Single EC shall promptly review the SAE to assess causality, participant safety, adequacy of site response, corrective and preventive actions, need for protocol amendments, and determine compensation for research participants for research-related injuries as per applicable requirements for biomedical and health research/clinical trials.

43. Is reporting of site-specific Serious Adverse Events (SAEs) to the local institutional Ethics Committee mandatory, in addition to reporting to the Single EC?

No, Reporting of SAE to the local site ethics committee is not mandatory.

44. How are protocol deviations, violations, and non-compliance events managed under the single ethics review framework?

The site PI shall report protocol deviations, violations, non-compliance and adverse events to the c-PI in a timely manner, who would communicate with Single EC for review and recommendations. In such cases, the Single EC shall review as per applicable procedures through expedited/ full committee reviews and decide needful action.

45. How are site monitoring visits conducted in multicentre studies reviewed by a Single EC?

Single EC may plan site monitoring (for-cause or routine) for a research study involving a high degree of risk to participants or if there are heightened societal concerns, vulnerable persons or media reports or any other concern and in such cases, the Single EC may coordinate with the site EC Member Secretary to plan and designate local EC members to undertake the site visit.

46. Is routine and/or for-cause site monitoring by the Single EC mandatory for all participating sites? How should it be conducted if a site has no Ethics Committee or local Ethics Committee members are unwilling to assist?

No. Routine site monitoring is not mandatory. Single EC would be responsible for monitoring and oversight across all participating sites and shall determine an appropriate frequency for receiving the continuing review reports based on the level of risk. Additionally, the participating research institutions have an oversight responsibility to ensure compliance of the research conduct as per the approved version of the research protocol.

47. What role do participating research institutions play in ensuring compliance during a multicentre research study?

Research institutions have an oversight responsibility to ensure compliance of the research conduct as per the approved version of the research protocol. Research Integrity Office in institutions must oversee and ensure adherence to ethical standards, data integrity, address research misconduct, and facilitate consistent implementation of approved protocol. The research institutions must set up systems to ensure quality in the conduct of research and close oversight.

48. What responsibilities does the Single EC have regarding storage and archiving of study documents?

All documentation and communications should be appropriately dated, labelled and filed by the Single EC for at least 3 years after completion of the study or more as per applicable regulatory requirements. Records may be archived for a longer period, if required by the sponsors/ regulatory bodies or in view of type of study.

49. What additional budget considerations should be included when planning a multicentre study under a single ethics review?

The multicentre study protocol must pre-emptively plan and include additional budgets related to scientific review, Single EC review, additional manpower or support, for review, communication and networking among sites.

50. Do international collaborative multicentre studies require ethics review in India if they have already been approved elsewhere?

No, any multicentre studies involving international collaborations, approved elsewhere in any other country, will still require an ethics review in India.

51. In an international multicentre study with multiple participating sites in India, is it mandatory to designate an Indian c-PI to adopt the single ethics review model?

Yes. To adopt the single ethics review model, it is mandatory to identify an Indian c-PI from one of the participating Indian sites. The Indian participating sites would function as partners in the research, with the Indian c-PI coordinating the ethics review process for all participating sites in India.

52. Does the single ethics review framework change the requirements for Health Ministry's Screening Committee (HMSC) approval?

No. The single ethics review framework does not alter the existing requirements for HMSC approval. Studies that require HMSC approval must continue to obtain it.

53. In the single ethics review mechanism, should all Ethics Committees be listed in the Clinical Trials Registry- India (CTRI) registration?

In the CTRI registration, the Single EC should be listed as the reviewing Ethics Committee for the study. Additionally, all participating institutions/sites should be listed to ensure transparency regarding all participating centres.

54. Is there any specific training required for investigators and Ethics Committee members involved in single ethics review of multicentre research?

Yes. All investigators and Single EC members involved in multicentre research should receive training on the Single Ethics Review process. Investigators should be trained in operational aspects and research ethics, while Single EC members should be trained in reviewing site-specific information, protocols, informed consent documents, and remain updated on applicable ethical and regulatory requirements.

55. Does an existing Ethics Committee need to modify its membership to serve as the Single EC?

No. There is no need for a membership change to serve as a Single EC. However, it should meet the eligibility criteria as described in Table 2 of the ICMR Operational Guidelines for single ethics review of Multicentre Research in India.

56. Should Ethics Committees intending to function as a Single EC update their Standard Operating Procedures (SOPs) to include the review of multicentre studies conducted at other participating sites?

Yes. Ethics Committees functioning as a Single EC should update their SOPs to incorporate the processes and responsibilities related to the review and oversight of multicentre research conducted across participating sites.

57. Do Ethics Committee SOPs for implementing the single ethics review mechanism require prior review or approval by DHR or any other regulatory authority?

No. Prior review or approval by DHR or any other regulatory authority is not required.

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