University of New Mexico Comprehensive Cancer Center / New Mexico Cancer Care Alliance

STANDARD OPERATING PROCEDURE

Clinical Research Office

Title: SUBMITTING A NEW STUDY APPLICATION TO AN INSTITUTIONAL REVIEW BOARD

SOP No.: 2.6	Version No.: 4	Effective Date: 9-2008

Owner: NMCCA Clinical Research Supervisor

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Signature 12/19/17 Date

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Signature 3/8/2018 Date

INTRODUCTION AND PURPOSE

The Primary responsibility of an Institutional Review Board (IRB) is to protect the rights and welfare of research subjects. Federal regulations require that the IRB of record for a given study ensure that certain criteria are met prior to the enrollment of patients onto the study.

The New Mexico Cancer Care Alliance (NMCCA) is a collaborative, non-profit organization developed with the University of New Mexico (UNM) Comprehensive Cancer Center (CCC) with the goal of increasing the availability of oncology clinical trials to the patients of New Mexico. In order to accomplish this, all member institutions and practice groups have signed Institutional or Physician Practice IRB agreements to use either a community IRB or a centralized (national) IRB. Alliance institutions and practices each hold, or are components of, a Federal Wide Assurance (FWA). Unaffiliated investigator agreements are used in cases in cases where the physician is a solo practitioner. IRBs included in these agreements are: the UNM CCC Human Research Review Committee (HRRC; comprised of four individual IRBs), the National Cancer Institute (NCI) Adult and Pediatric Central IRBs (CIRBs), and the Western IRB (WIRB; comprised of fourteen individual panels).

As a result of these arrangements, a clinical trial can be submitted for full IRB committee review for an initial practice site, with subsequent or concurrent review for any additional sites wishing to participate in the study. For all pharmaceutical studies, inclusion of a completed Food and Drug Administration (FDA) form 1572, Statement of Investigator, is mandatory.

This standard operating procedure (SOP) describes the preparation, submission, maintenance and training relating to submission of new study applications to an IRB. It also describes procedures for the submission of documentation necessary to open studies at additional clinical sites, as well as procedures for consolidation of more than one clinical site into single, multi-site informed consent forms (ICF).This procedure outlines the current NMCCA approach to handling of external safety reports.

These written procedures are used to achieve uniformity of the performance of regulatory staff, for training purposes and to ensure compliance with all IRB/FDA regulations and guidelines with the ultimate goal of protecting the safety and well-being of study subjects.

SCOPE

This SOP applies to the regulatory staff of the University of New Mexico Cancer Center (affiliates and satellites), the New Mexico Cancer Care Alliance and the University of New Mexico Department of Pediatrics when conducting oncology and oncology related studies. It describes procedures focused on the preparation and submission of new study applications; including those subject to investigational new drug (IND) regulations for drugs and biologics in all phases of development. Procedures for development and formatting of informed consent documents are covered in a related SOP.

APPLICABLE REGULATIONS AND GUIDELINES

21 CFR 50	Protection of Human Subjects
21 CFR 56	Institutional Review Boards
21 CFR 46	Protection of Human Subjects
21 CFR 312.32	IND Safety Reports
	Selecting Investigators and Monitors

21 CFR 312.53	Emergency Research
21 CFR 312.54	General Responsibilities of Investigators
21 CFR 312.60	
21 CFR 312.66	Assurance of IRB Review
ICH E6 (r2)	Section 3.0 and Section 4.0
FDA Information Sheets, October 1998, February 2012	Frequently Asked Questions, IRB Continuing Review After Clinical Investigation Approval
FDA Center for Biologics Evaluation and Research:	http://www.fda.gov/cber/ind/ind.htm
Note to File v. 01Aug2011	Implementation of Single, Multi-Site Consent Forms
CRO Regulatory Process 2011-EAE-01 v. 01Nov2011	External Safety Report Memo of Understanding (UNM CRO, UNM HRPO and NMCCA)

REFERENCES TO OTHER APPLICABLE SOPs

SOP 1.2	Responsibilities of the Research Team
SOP 1.4	Conflicts of Interest in Research
SOP 2.3	Site Initiation Meetings and Visits
SOP 2.4	Study Activation
SOP 2.5	Completing An FDA Form 1572
SOP 3.1	Interactions with the Institutional Review Board
SOP 3.2	Regulatory Files and Subject Records
SOP 3.6	Handling of Amendments and Revisions
SOP 3.7	Correspondence with the Human Research Protections Office (HRPO) and General Clinical Research Center (GCRC)
SOP 4.1	Informed Consent Development and Implementation
SOP 4.6	Creating and Implementing a Parallel Consent Form

RESPONSIBILITY

NMCCA Project Specialist

NMCCA Protocol and Outreach Coordinator

NMCCA Clinical Research Manager (CRM)

CRO/NMCCA Executive Director

Clinical Working Group (CWG)

Protocol Review and Monitoring Committee (PRMC)

NMCCA Clinical Research Supervisor (CRS)

NMCCA Regulatory Coordinators

Site staff and investigators

The NMCCA Project Specialist is responsible for the collection and submission of investigator documentation and management of National Clinical Trial Network group membership activities. The NMCCA Project Specialist is responsible for communicating requirements for initial and continuing formal human research subject training to investigators and obtaining documented proof of training for use by the regulatory staff in preparing IRB submissions.

It is the responsibility of the UNMCCC disease site Clinical Working Groups (CWG) and Protocol Review and Monitoring Committee (PRMC) to review all new study protocols for consideration including feasibility and potential sponsor requirements for special applications such as Institutional Biosafety review, and to issue formal approval or declination of presented trials.

It is the responsibility of the NMCCA CRS, and the Protocol & Outreach Coordinator, CRM to coordinate formal site selection activities for CWG-approved studies funded by pharmaceutical (industry) sponsors, and to maintain related records in electronic database. These individuals are responsible for providing site selection information and approval documentation to the assigned regulatory staff who in turn manages the IRB application submission following formal site selection.

It is the responsibility of the CRO/NMCCA Executive Director to manage sponsor contractual negotiations and study budget agreements pertaining to information for regulatory staff to include in IRB applications and informed consent forms (ICFs).

It is the responsibility of the NMCCA CRS to assign PRMC approved studies to regulatory staff for processing.

It is the responsibility of all regulatory staff to follow SOPs and policies governing new study submissions, development of informed consent documents, submission of study amendments and continuing review reports, and to maintain real-time, updated records of progress including study statuses in the CRO electronic data base. Regulatory staff are responsible for all formal, written study site team communications to include amendment of informed consent documents and instructions by the study sponsor and/or IRB of record regarding potential need for patient/subject re-consent or notification.

PROCEDURES

Documenting IRB Compliance

Owner	Criteria / Steps
NMCCA/ CRS	Request copies of documentation/accreditation indicating that the IRBs are duly constituted and compliant with federal and state regulations Ensure that Federal Wide Assurances are current for participating member institutions Request and maintain current copies of IRB membership listings

Documenting Investigator Compliance

Owner	Criteria / Steps
NMCCA Project Specialist	Assist physician investigators in acquisition and renewal of NCI Investigator numbers and membership in NCI National Clinical Trial Network NCTN groups
Primary Regulatory Coordinator	Ensure that each physician investigator who will participate in each study has provided necessary documentation and proof of required human subjects research and other training as specified for each study. Confirm that each physician investigator who will participate in each NCI study has a current NCI Investigator number and appropriate membership in the sponsoring NCTN Group.

Initial IRB Application –

Owner	Criteria / Steps
Protocol & Outreach Coordinator / NMCCA CRM	Collect formal review forms for PRMC new study review and assemble complete study packets. Assist in formal site selection activities (feasibility forms, etc.) as required. Provide packets to NMCCA CRS. Enter all assigned study data elements in electronic database for study packet completion and reporting.
Executive Director	Coordinate contractual and budget negotiations for industry and industry funded investigator initiated trials.
NMCCA CRS	Receive new study application packets after PRMC approval, including the following completed documents, signed as needed: Working Group Review/Approval form Research Coordinator Report form All formal PRMC review forms Site selection documentation as applicable NMCCA/PRMC Decision letter Study Risk Assignment form HRRC Departmental Review form Agreements, as applicable, regarding external AE management policy

	Complete National Cancer Institute and other required electronic database data elements forms and enter in system. Assign staff as Primary Regulatory Coordinator. Obtain clinical team assignments from participant sites including UNM CCC Clinical Research Operations Manager.
Primary Regulatory Coordinator	Promptly create and update the study in Velos. Ensure study status is correct and updated to reflect startup timeline, as well as participating sites and the study team. Save all completed study documentation on the common, secure regulatory drive for backup and access purposes. Request the completion of the Medicare Coverage Analysis. Contact all sites listed to confirm desire to participate in study; update Velos and other elements as required in electronic database for each site. Pharmaceutical studies: investigate whether study has been previously opened through the WIRB and whether a Spanish translation of the study ICF(s) is readily available. Confirm paid elements for trial with Executive Director and by content of PRMC review forms and MCA. Confirm formal site selection status with NMCCA CRS and Protocol & Outreach Coordinator before submitting applications to IRB of record. NCI studies: investigate whether study is approved by the NCI CIRB. Read protocol, CWG, and PRMC clinical trial assessment forms to understand the required activities/tasks to achieve study activation. If applicable, draft IND application (FDA Form 1571; Form B); submit to PI for signature; submit to sponsor. Draft application as required by the IRB of record using most current version. Enter study team information through the UNM Click IRB system to generate eCOIs, if applicable. As needed, draft initial Informed Consent Form using sponsor templates and/or established IRB consent formatting guidelines. Whenever possible, use a single, multi-site ICF including all participating sites. Complete FDA Form 1572 (pharmaceutical studies only); submit to PI for signature. Submit to sponsor. Obtain appropriate documentation for laboratories, pharmacies, radiology and other applicable ancillary departments, that will be included in the conduct of the study. Maintain in regulatory binder.

Owner	Criteria / Steps
Principal /Sub Investigator Site Staff & Investigator	Review, sign and date FDA form, if applicable, and return to Primary Regulatory Coordinator Assist Primary Regulatory Coordinator with revisions, provide protocol amendments and provide input for responses to sponsor requests as needed All research personnel: complete, sign and date any relevant forms as required and return promptly to Primary Regulatory Coordinator.
Primary Regulatory Coordinator	Submit completed application and supporting documentation per most current, IRB-specific guidelines and policies to: **HRRC**: for pre-review (pre-Committee review by Human Research Protection Office (HRPO) research analysts provided to improve quality of application). Make all required final revisions per HRPO pre-review report and re-submit for full committee review. **NCI CIRB:** submit Study Specific Worksheet about Local Context. Post-IRB Approval, produce consent(s) using approved Boilerplate language and send to CTSU for study activation. **WIRB**: submit for full committee review Following submission to all IRBs: Maintain application tracking information (WIRB) and update electronic database Schedule a Site Initiation Meeting (SIM) with study staff and PI or Site Initiation Visit (SIV) with study staff, PI, and pharmaceutical representative. Produce a draft PowerPoint presentation for all NCI and Investigator Initiated Trials; send to PI for review, editing and approval. POST-IRB approval: Complete a CRO Site Initiation Checklist for each site. Upload to Velos for common access/reference.• Notify NMCCA CRS or Executive Director in writing when the study can be marked Open/Active. Send email notification to all designated site PIs, staff, pharmacy and lab personnel, imaging technicians, business managers and NMCCA, UNMCC website coordinators announcing that the study is open to enrollment. Maintain copy of communication in regulatory study binder.

Additional Site IRB Application –

Owner	Criteria / Steps
Primary Regulatory Coordinator	For sites not included in initial IRB application (e.g. due to existing trial menu, staffing, site selection, etc.): Confirm site eligibility, including formal site selection and individuals' training status for participation in study

	CIRB studies: determine whether annual renewal is expected within the next 4 to 6 weeks. Communicate with NMCCA CRS about appropriate action with respect to possible submission delay. Draft a site-specific consent using the most current, IRB-approved consent form OR update the existing single, multi-site consent document as needed. Obtain appropriate documentation for laboratories and pharmacies that will be involved in study activities. Prepare a new (or update a single, multi-site consolidated) FDA Form 1572 as required and submit to PI for signature. Submit to sponsor for approval. Update electronic database as described for initial application.
PI – Sub P/I Clinical Research Staff	Sign and date FDA form 1572, if applicable, and return to Primary Regulatory Coordinator. All new research personnel complete and submit eCOI forms, as applicable.
Primary Regulatory Coordinator	Submit application materials to IRB of record as outlined above. Notify NMCCA CRS or Executive Director when the study can be marked Open/Active. Complete a CRO Site Initiation Checklist for the new site(s). Upload to Velos for common access/reference Send email notification to all designated site PIs, staff, pharmacy and lab personnel, imaging technicians, business managers and NMCCA, UNMCC website coordinators announcing that the study is open to enrollment. Maintain copy of communication in regulatory study binder,