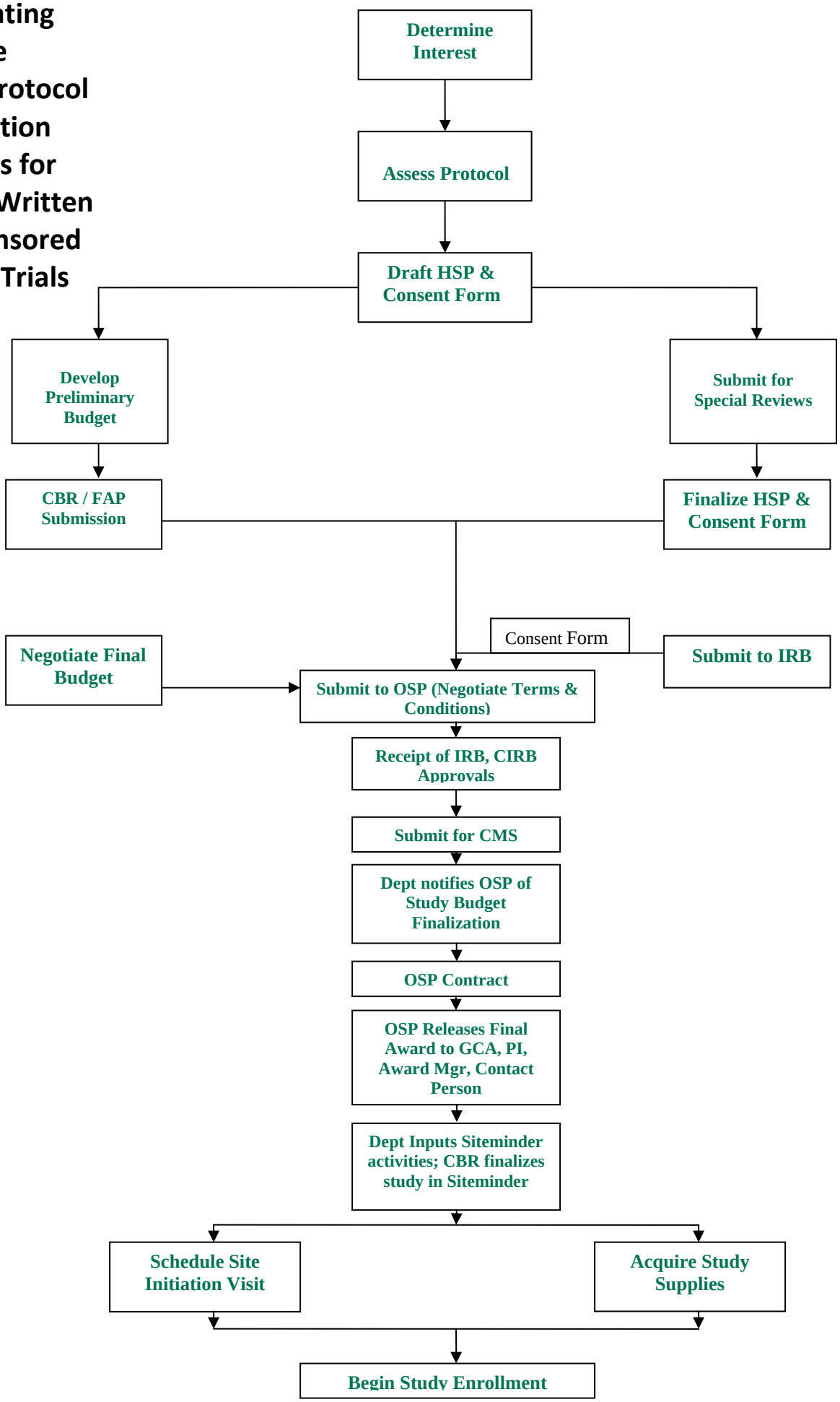
Navigating the Clinical Protocol Activation Process for Industry-Written and Sponsored Clinical Trials



Navigating the Clinical Protocol Activation Process for Industry-Written and Sponsored Clinical Trials (Best Practices Document)

"Navigating the Clinical Protocol Activation Process for Industry-Written and Sponsored Clinical Trials" outlines the best practice for processing industry-written and sponsored clinical studies at UAB. There are many small steps in each of the larger defined steps (see flow diagram). Each step is very important and establishes a good foundation for the next. Note that as you navigate the process, while some steps are serial others are parallel or concurrent and there is a true flow to the process to get the desired outcome. The desired outcome is to have a finalized budget, required regulatory approvals (ie CIRB, IRB) and fully negotiated and executed contract simultaneously.

This document is a living document and the flow is subject to change as some systems change, processes streamline and improve, etc. Please don't hesitate to submit any questions, suggestions, or comments you may have to the Office of Sponsored Programs at **askosp@uab.edu** and we will respond timely.

GLOSSARY TERMS

CDA – Confidentiality Disclosure Agreement
CIRB – Conflict of Interest Review Board
HSP – Human Subjects Protocol
NDA – Non-disclosure Agreement
OIRB – Office of Institutional Review Board
OSP – Office of Sponsored Programs

DETERMINE INTEREST

Find funding opportunity/determine interest

Initial Contact

CDA, NDA required?

- Inquire about using UAB's template CDA available on OSP's website at **http://www.uab.edu/osp/confidentiality-agreements-cda** or
- If sponsor requires use of their CDA, NDA submit **UAB Contract Language Guidelines for Industry Sponsors of CDAs** with your request to the sponsor for the CDA
- Send **UAB Contract Language Guidelines for Industry Sponsors of Clinical Trial Agreements** for sponsor's information
- On receipt of sponsor's CDA or partially executed UAB template CDA submit it with the **UAB Expedited Checklist** to OSP (**osp@uab.edu**)

ASSESS PROTOCOL

Assess Protocol to determine interest, opportunity, resources, and determine if planning to proceed. If yes –

Determine activities and related locations

- Identify all potential study personnel
- Budget considerations, will the protocol utilize:
  - Center for Clinical and Translational Science (CCTS) services, ie CRU, or
  - Category A or B devices, or
  - Clinical billable services, ie services provided and/or billed by any UAB Health System location, or
  - Other service providers, ie Dermatology Research, Ophthalmology, Radiology Research, etc?
  - Any other departmental costs, ie personnel, file storage, additional review or start-up fees for other service providers (ie BMT/Apheresis or Pharmacy)?
- Special reviews/approvals required for the protocol:
  - Special reviews/approvals – potentially hazard agents:

Radioisotopes	Microbial agents	Recombinant DNA/RNA molecules
Toxic chemicals	Gene Therapy	Toxins
Nanoparticles	Experimental Drugs	Vaccines
Carcinogens	Mutagens	Teratogenics

- Obtaining anatomic pathologic materials cells, tissue or organs (from any body site) or clinical pathologic materials (serum, plasma, cerebrospinal fluid or non-tissue-based microbiologic specimens)?
- UAB cancer patients involved?
  - Study conducted at any of the following locations/site, ie UAB Hospital, Highlands, Kirklin Clinic, Children's Hospital, Eye Foundation? Jefferson County Department of Health?
  - Participants involved with contagious infections at UAB or Children's Hospital?
  - Dispensing of drugs to participants at UAB or Children's Hospital involved?

DRAFT HSP and CONSENT FORM

Draft HSP and Consent Form for applicable review board

- UAB – Human Subjects Protocol (HSP)
- WIRB – Initial Review Submission form

DEVELOP PRELIMINARY BUDGET *[budget development and special review process should be parallel]*

If using -

- CCTS services, ie, CRU (NOTE: keep in mind to notify OSP of this decision as negotiations with sponsor requires special contract language)?
    - Complete **CRU application** and include the following in the submission
        - Study protocol
        - Appendix-I-Data Safety Monitoring plan (if applicable)
        - Consent form (draft or approved)
        - HSP or WIRB application
    - Submit electronically (one copy) to Beth Morton, **bmorton@uab.edu** and 2 hard copies of all to Attn: Beth Morton, JT 1506, zip 6909 (Must be submitted by the 1st of the month for 3rd Friday review of that month).
- Category A or B devices?
    - Submit the following to Hospital Finance, Ron Evans, **raevans@uabmc.edu**
        - Study protocol
        - Draft consent form
        - FDA letter for the specific device
        - Information about cost of the device and whether or not the Hospital will be expected to purchase
- Other service providers?
    - Submit to applicable service providers (protocol, study manuals and department request form)
        - Boshell Diabetes CV MRI – Dr. William Evanochko, **susej@uab.edu**
        - Civitan Functional Neuroimaging Lab – Dr. Rotem Elgavish, cc: Autumn Alexander, **autumnl@uab.edu**
        - Dermatology Research – Wendy Cantrell, **wcantrell@uabmc.edu**
        - UAB Hospital Research Pharmacy – Rebecca Quinn, **rquinn@uabmc.edu** and complete the **UAB Pharmacy Release Form**
        - Ophthalmology Research, Ashley Knight, **knightae@uab.edu** and complete the **Ophthalmology New Account for Ophthalmology Research Exams** (price request form)
        - Radiology research – Haley Witte, **radresearch@uab.edu** and complete the **Research Quote Request for Services Involving Radiology** (research quote form)
        - Tissue Procurement – Kathy Sexton, **sexton@uab.edu** and complete the appropriate request form: **Tissue Procurement Price Request** or **Price Request for Tissue Remnants**
        - Bone Marrow Transplant (BMT)/Apheresis – Dr. Larry Lamb, **llamb@uab.edu** and/or Szymanski Fields,**sfields@uabmc.edu**

SUBMIT FOR SPECIAL REVIEWS (***as applicable)***

- Conflict of Interest
  - Disclosures must be submitted to the **Conflict of Interest Review Board** (CIRB) by the principal investigator/program director and any other person who is responsible for the design, conduct or reporting of the research including anyone who is involved in the informed consent process for human studies. Note: Conflict of interest disclosures must be submitted to IRB and will be forwarded to WIRB. For questions call CIRB at 975-9691 or forward to **cirb@uab.edu**.

- Scientific merit
  - Department specific review, submit **Protocol Oversight Review Form** or **PORF** using department letterhead
  - CCC Clinical Trials Review Committee (CTRC) – protocols that involve cancer patients at UAB must be submitted to the **CTRC** for review and approval (contact Pam Alverson, 975-9877 or **pam.alverson@ccc.uab.edu** for information and submission forms)

- Safety
  - Register Your Project with OH&S - **Registering your project with OH&S**
  - Project Registration - **Appendix G**
  - Registration for Recombinant DNA Research - **Appendix H**
  - Internal Biosafety Committee (IBC) Review for Vaccines, Biologics trials

- Project review panels (all information available in UAB IRB website and guidebook)
  - Gene therapy including Gene Therapy Vaccine Trials Project Review Panel - **Gene Therapy Project Review Panel**
  - Report of the Project Review Panel – **Report of the Project Review Panel**
  - HIV Vaccine Trials Exempt from the NIH GuidelinesVaccine Trials Project Review Panel – **Vaccine Trials Project Review Panel**

- Protocol Oversight Review Form (for HIV Clinical Vaccine Trials, Including Exemption for the NIH Guidelines) – **PORF for Vaccine Trials** using department letterhead (PORF available on the UAB IRB website)

- Infection control
  - UAB Hospital, 934-5324, submit a copy of the protocol to: Dr. Alan Stamm, FOT 740 or **astamm@uab.edu**
  - Children's Hospital, 939-9265, submit a copy of the protocol via email to: Brenda Vason, **brenda.vason@chsys.org** – **NOTE:** allow 7 business days for review. Children's Hospital communicates approval to IRB directly.

- Pharmacy
  - UAB Hospital
    - Complete the UAB Hospital Pharmacy Release Form **Pharmacy Release Form**
    - Send this form along with a hard copy of the following documents by campus mail to JT 1728, zip 6860 – **NOTE**: allow 7-10 days for review.

- Pharmacy Release Form
- Study protocol
- Investigator's brochure, if available

o Children's Hospital
- Submit a hard copy of the study protocol to: TCHA Investigational Study Pharmacy, Attn: Brenda Denson, Central Pharmacy, Basement, Children's Hospital
- TCHA pharmacy completes the **TCHA Pharmacy Release Form** and forwards to the Pharmacy director for signature.
- TCHA notifies the coordinator when forms (3 copies) are ready for pick-up.
- Principal Investigator signs all copies and returns 2 copies to TCHA pharmacy

- Pathology (anatomic or clinical)
  - o Complete and sign the **Anatomic Pathology Release Form** and submit along with a hard copy of the study protocol to the Office of the Director for Anatomic Pathology, Kracke Building, Room 506.
  - o Complete and sign the **Clinical Pathology Release Form** and submit along with a hard copy of the study protocol to the Office of the Director for Clinical Pathology, West Pavilion, Room P230.
  - o The Principal Investigator is contacted by phone once the form is ready for pickup.

- Facility Acknowledgement
  - o Submit an email which includes the study title, sponsor name, Principal Investigator name and department, coordinator name and contact information – **NOTE**: include a copy of the Facility Acknowledgement email in the IRB submission.

- Facilities and contacts are
  - o UAB Hospital or UAB Highlands, Ivy Cook, **icook@uabmc.edu**
  - o Kirklin Clinic, Frances Clark, **fclark@uabmc.edu**
  - o Callahan Eye Foundation Hospital, Leigh Aufdemorte, **laufdemorte@uabmc.edu**
  - o Children's Hospital, Pam Barlow, **pam.barlow@chsys.org**
  - o Jefferson County Department of Health, Richard Sinsky, 205.930.1114

CBR/FAP SUBMISSION

- Does the trial include Clinical billable services? CBR Submission
  - o Complete CBR Submission Form and submit to **FAP@uab.edu** and include the following in the submission
    - Study protocol
    - Draft consent form
    - Radiology or Flow Cytometry ancillary forms, if applicable
    - Bill-to-designation form (example using the protocol schematic or excel template **http://www.uab.edu/osp/forms**)
    - Sponsor's budget (draft)

- If a device include the Hospital Letter of Agreement for Category B Device Trial and Non-significant/Significant Risk Designation Letter

FINALIZE HSP and CONSENT FORM

The submission to OSP and IRB with CIRB disclosures should be coordinated in parallel while negotiating and finalizing the budget.

Note: Documents submitted for FAP do not need to be resubmitted with the OSP submission unless the documents have been modified or updated.

NEGOTIATE FINAL BUDGET (Department Administrator)

Department will negotiate final budget with the industry sponsor.

SUBMIT TO OSP

- Submit **all required** documents, Checklist must be submitted with signatures, other documents must be submitted electronically to **osp@uab.edu**
    - Completed Extramural Checklist **http://www.uab.edu/osp/forms**
    - Electronic version (Word) of the clinical trial agreement/contract
    - Protocol
    - Informed Consent Form (draft or final)
    - CRU letter (if applicable)
    - Investigator Agreement (if applicable)
    - Hospital Letter of Agreement for Category B Device Trial (if applicable)
    - NS/SR Designation Letter

Note: ***Negotiation of contract terms occurs in parallel with department budget negotiations; however, an executed contract is contingent on having a finalized budget, CIRB release and IRB approval****.*

SUBMIT TO IRB

- All required documents
    - New, **Expedited Review Protocols**
    - New, **Convened Review Protocols**
    - New, **Gene Therapy Protocols** (Convened Review)
    - **WIRB New Review Cover Letter/Checklist**
    - Ensure that all CIRB disclosures have been filed

Note: Projects to be reviewed by WIRB are **NOT** forwarded until CIRB release is issued.

RECEIPT OF IRB, CIRB APPROVALS

- UAB IRB Policy 005 (**http://www.uab.edu/irb/policy/005%20-%20plan--sponsors.pdf**) requires the designated IRB to review and approve research in which the commercial sponsor holds the IND or IDE or is providing product for the study before a written contract with the sponsor is signed. The contract will not be signed by UAB until IRB approval is released by OIRB and is received by OSP.

  Note: If the commercial sponsor requires compliance with ICH-GCP, UAB's WIRB liaison will not release the WIRB approval required under IRB POL005 without confirming that the UAB key personnel listed on the WIRB Initial Review Submission Form have completed the appropriate training and the training is documented in the Blazer ID Enabled Dissemination/Recognition of Official Content (BEDROC).

- UAB's Conflict of Interest Review Board (CIRB) will notify OSP when the project has been reviewed against UAB's Conflict of Interest Policy and will provide OSP notification that "it is OK to release funds upon award" as approval.

  Note: In the vast majority of industry sponsored clinical trials at UAB the central IRB for your project will be WIRB. There is a requirement for CIRB review and release prior to the WIRB application being forwarded by the UAB WIRB liaison to WIRB for review and approval. The UAB WIRB liaison must receive and will review the statement of conflict or no conflict from CIRB ensuring that it matches the investigator WIRB Initial Review Submission Form. If your industry sponsored clinical trial meet(s) the criteria for review by UAB IRB, CIRB release is not a requirement for review and approval, but it is a requirement for OSP to issue your award.

SUBMIT FOR CMS REVIEW (*if applicable)*

- Using category A or B devices?
- Submit protocol, IRB approval letter and approved consent, FDA letter and IDE form to University Compliance Office (UCO) for submission to CMS
- Upon receipt, UCO forwards CMS approval letter to PI/Research Coordinator

DEPARTMENT NOTIFIES OSP OF STUDY BUDGET FINALIZATION

- Once budget negotiations are concluded the department will notify OSP that the budget is final, providing OSP with the agreed upon budget in the sponsor's per patient/per visit format. The internal budget should be forwarded to OSP at this time.

OSP CONTRACT EXECUTION

- Once OSP has negotiated the terms and conditions of the contract, receives approval from the central IRB, receives communication from CIRB that the project is "OK to release", and is informed by the department that the budget is final, the contract will be presented for institutional signature.

Note: In many instances the sponsor requires UAB to sign the contract first. As a result, the UAB executed documents must be returned to the sponsor for counter signature prior to the award being distributed. UAB requires a "wet ink" UAB signature be maintained in the contract record.

OSP RELEASES FINAL AWARD TO GCA, PI, AWARD MGR. AND CONTACT PERSON

- OSP will issue the final award copying the PI, contact person, award manager and Grants and Contracts Accounting (GCA). The award will consist of the updated version of the Extramural Checklist, the contract (terms and conditions of the project), the internal budget, and any third party document (Letter of Indemnification (LOI)) required to ensure that UAB is indemnified in accordance with its policy (LOI required when indemnification is not included in the contract).

  Note: Due to administrative process it may take GCA up to an additional 5 days to process this award into an active account. If you have additional questions about the status, please contact Tina Ealy in the Grants and Contracts Accounting Department at 934-9388 or **tina@uab.edu**.

DEPT. INPUTS SITEMINDER ACTIVITIES; CBR FINALIZES STUDY IN SITEMINDER

- Department inputs "1"s or "$" in budget record.
- CBR review of Study, Site Placement, Budget Record for accuracy and completeness.
- CBR e-mails study coordinator and financial contact once study is finalized in Siteminder.

SCHEDULE SITE INITIATION VISIT

- Work with study sponsor to schedule initial site visit.

ACQUIRE STUDY SUPPLIES

- Set up activities to prepare for enrollment.

BEGIN STUDY ENROLLMENT

- ***Note: Clinicaltrials.gov registration*** *should be completed before study enrollment begins. For industry-written trials, the Sponsor is responsible for the registration process unless contracted to UAB per the funding agreement (because of the associated responsibilities and liabilities this is strongly discouraged). Please submit any questions to* ***askosp@uab.edu****.*