Clinical and Translational Science Institute / CTSI
at the University of California, San Francisco

Welcome to Online Training for Clinical Research Coordinators

ROLE OF THE RESEARCH COORDINATOR

Study Start-up Best Practices

Objectives

- Define the sponsor of a clinical trial and learn the difference in types of sponsors
- Understand the financial process supporting the clinical trial
- Understand the regulatory approval process
- Becoming the project leader of the protocol

Definition of the Sponsor

PART 312 -- INVESTIGATIONAL NEW DRUG APPLICATION

Subpart D-Responsibilities of Sponsors and Investigators; Sec. 312.50

General responsibilities of sponsors:

- Sponsors are responsible for selecting qualified investigators, providing them with the information they need to conduct an investigation properly, ensuring proper monitoring of the investigation(s), ensuring that the investigation(s) is conducted in accordance with the general investigational plan and protocols contained in the IND, maintaining an effective IND with respect to the investigations, and ensuring that FDA and all participating investigators are promptly informed of significant new adverse effects or risks with respect to the drug.
- Additional specific responsibilities of sponsors are described elsewhere in this part.
- Sponsorship governs budget, preparation of data forms, data management, monitoring, auditing of the study, and publishing the results.

Who is a Clinical Trials Sponsor?

1. **When Industry or NIH (federal) is the Sponsor with FDA involvement:**
   - IND or IDE held by sponsor; UCSF investigator of one site;
   - UCSF investigator is then responsible for only the investigator responsibilities as stated in 21CFR 312.
2. **When the UCSF Investigator is the Sponsor with FDA involvement:**
   - IND or IDE held by UCSF investigator ;
   - UCSF investigator is then responsible to FDA via reporting requirements of 21CFR 312 for BOTH investigator AND sponsor;
   - The sponsor-investigator may or may not be partnered with another University as lead PI in a multicenter study, and if so must comply with all sponsor responsibilities in 21CFR312.50.
3. **Investigator can be a Sponsor *without FDA oversight*; funding comes from a grant**
   - No IND or IDE; using FDA approved drug/device or surgical intervention;
   - Grant from federal source, Dept. of Defense, or even home department

Project Management Tasks to Start the Trial

Tips and Tricks

Whomever sponsors the trial, the Coordinator assists the investigator to get three major approvals completed, before the start of the trial:

- Department approvals to provide infrastructure to successfully manage the study.
- Financial approvals; including budget preparation. All trials receive money and spend money.
- Regulatory approvals; Institutional Review Board, but know there are other possible regulatory approvals.

Does your Site Have Suitable Resources and Infrastructure to do the Study?

Regardless who is sponsoring the study, assess your resources! Read the protocol carefully to brainstorm how to handle the following:

- Required subject population
- Enough trained personnel
- Access to the needed lab equipment, EKG machine
- Ancillary department support such as infusion center, pathology, radiology, pharmacy, or surgery
- Space and storage of research charts and binders
- Budget to pay for everything above –see next slide

Tips and Tricks: Planning is the foundation for successful project management

Financial Approval Starts with a Budget

Will the $$ in …

match the $$ out?

- Accurate planning assessment will assist in budget preparation so all costs are accounted for;
- Review study calendar and think of full scope of study beginning to end; includes personnel needed; access to master charge list for hospital costs is essential.
- Who in your department prepares, approves, and tracks budget for research studies;
- Sponsor will provide payment milestones
- Medicare Coverage analysis is required
  - The Medicare Coverage Analysis (MCA) is required for all clinical research studies anticipating enrolling Medicare beneficiaries for third party billing of costs associated with items and services related to routine care.

Financial Approval Includes Review of Budget and Legal Contracts for the Business of Conducting Clinical Trials at the UC campus

- Budget costs must match what is in the informed consent telling the costs of enrolling as a subject.
- Make sure these documents match!
- Approved billing for hospital services will need to be entered into APEX
- Is the contract acceptable; must be reviewed by UCSF contracts office; depends on federal contracts or industry contracts? Involves legal review, which can take time.
- Budget with Contract MUST BE SIGNED BEFORE enrolling the first subject! If not carefully planned, enrollment on the protocol can be 'closed' by the sponsor before your Department has completed the contract!!!

Regulatory Approval-What are Regulatory Documents?

- Signed protocol (pharmaceutical company signatures and Principal Investigator's signature, attesting to agreement to conduct study as written in the protocol)
- Investigators' CV, signed or initialed, and dated
- Proof of human subject protection training (i.e. CITI) must be up to date within the last three years.
- Lab certifications and lab normal ranges for institution,
- IRB approval,
- Financial disclosure forms, attesting to lack of conflict of interest
- Signed FDA 1572, attesting to Investigator's commitment to run the study according to the federal regulations (21 CFR312)
- **CANNOT ENROLL SUBJECTS BEFORE REGULATORY DOCs are SUBMITTED and APPROVED**

What are Regulatory Documents?

UCSF Regulatory documentation can also include:

- Institutional Biological Safety Committee (IBC) Biological Use Authorization (BUA)
- Human Gene Transfer, NIH Recombinant DNA Advisory Committee
- Radiation Safety Committee (RAC)
- SFGH or VAMC approval forms-link UCSF HUB website: http://hub.ucsf.edu/
- If investigators for the community will be doing some parts of the protocol, find out how they will receive their own Institutional Review Board (IRB) approval for their institution
- UCSF IRB approval – see next slide

Protocol Regulatory Approval

What is submitted to the UCSF IRB as regulatory documents?

- CTSI Clinical Research Center (CRC) advisory committee approval (when using a CTSI supported research center to manage subjects for all or part of the study)
- Protocol Review Committee (PRC) approval letter (when the study involves cancer patients)
- UCSF Informed consent, on the correct template or an application of Waiver of Consent (and any translations being used)
- Health Information Portability and Accountability Act (HIPAA) authorization protection of security of data (check for copies in other languages)
- Patient recruitment materials
- REGISTER THE STUDY ON Clinical Trials.gov (for help go to the HUB http://hub.ucsf.edu/clinicaltrialsgov
- **CANNOT ENROLL SUBJECTS BEFORE REGULATORY DOCs are SUBMITTED and APPROVED**

Regulatory Approval

Preparation and Submission to the UCSF IRB

Requires training on the use of iRIS for electronic submission of documents

http://www.research.ucsf.edu/chr/Guide/chrFullRevApp.asp

The CRC as Project Leader: Best Practice
Let the Protocol Begin!

1. • Protocol is close to receiving all approvals; send protocol to pharmacy for research specific drug administration orders
2. • Supplies for the study and drug will be sent only after the final approvals are complete
3. • Industry monitors will conduct an initiation for the investigators and the research coordinators – CRC sets up this meeting which is a regulation requirement
4. • Research coordinator conducts initiation meetings with infusion center, laboratory, others who may need to understand the protocol and that you are the contact person

Initiate the Medical and Ancillary Team Members

The Research Coordinator is the Project Leader of the protocol.

Meet with Medical Staff, Nursing Staff to explain clinical trial documentation requirements, care or assessment of the subject outcomes, adverse events, and how to communicate with you for assistance

Initiation-Tips and Tricks

Do Not Enroll until you have created and /or received the tools required to manage the study (all your ducks in a row!)

What is needed:

- Drug order and administration forms
- Drug Accountability Records for Pharmacy
- Drug shipped to Pharmacy
- Patient compliance diary for source collection
- Special patient teaching instructions while on study. Nurses or Pharmacists may need to conduct the patient teaching.
- Template calendar of procedures you will individualize for each subject
- Database forms (case report forms); training on an industry electronic system or created in house at UCSF.

Study Start-up Complete! Enrollment has Begun!

- If possible, practice with another staff member to role play enrollment and study procedures right before you have your first subject identified.
- Plan for another staff member not involved in the study to monitor the first three subjects files to look for problems, deficiencies, or just to give credit for great preparation because everything is going smoothly!
- Start a deviation log to track events that are not done per protocol; report any events that meet the IRB definition of reportable deviations/violations. INVOLVE the PRINCIPAL INVESTIGATOR!!!
- Enter data as close to real time as possible;

Takeaways……

- **BEFORE ENROLLMENT:** Budget and Contract must be created, reviewed and approved (signatures)
- **BEFORE ENROLLMENT:** Protocol, informed consent, investigator brochures, or device brochures, patient advertisements, handouts…all require regulatory approval
- **BEFORE ENROLLMENT:** Does your study need other approvals from departments at the institution or FDA for investigational drugs and devices
- **BEFORE ENROLLMENT:** Conduct initiation meetings with ancillary staff who will be caring for the subjects on study. The more input they have up front, the more teamwork you will have during the study.