PR^{3}OCoM: PROTOCOL REGISTRATION AND RESULTS RECORD OVERSIGHT AND COMPLIANCE MANAGEMENT

September 10, 2018

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Registration and Results Reporting

- **FDA**: “The Final Rule” for Clinical Trails Registration and Results Information Submission (42 CFR Part 11), took effect on January 18, 2017, and organizations were expected to be in compliance by April 18, 2017. The legislation allows the **FDA to issue fines up to $11,569 day/per study for non-compliance**.
- **CMS**: Released Transmittal 2955 went into effect in 2015 requiring the mandatory reporting of an 8-digit clinical trial number on claims for items/services provided in clinical trials.
- **NIH:** Broader requirement that all trials funded by the NIH, Be registered, with the suggestion that the **NIH would withhold clinical trial funding** to grantee institutions if the agency is unable to verify adequate registration and results reporting from all trials funded at that institution.

Challenges

- Only a minority of institutions have a registration and results reporting policy.
- Of those that have a policy, only 11% required registration prior to IRB approval, and only 35% required registration prior to accrual.
- Only 19% have an electronic system to monitor compliance.
- Monitoring compliance, facilitating registration, and ensuring timely results reporting requires significant staff time.

What is PR^{3}OCOM

The PR^{3}OCoM System helps the institutional PRS Administrator(s) in the management of PRS “problem” records by providing:

1. More sophisticated filtering capabilities
2. Space for administrative notes on individual study records,
3. Study personnel (Record Owner and Responsible Party) contact information
4. Reports and metrics on problem longevity and resolution status
5. Capability to send bulk emails customized with problem-resolution instructions and study title.

NCATS Supplement Specific Aims

Specific Aim 1: Provide a HIPAA Safe Cloud environment to host PR^{3}OCoM Tracker

Specific Aim 2: Implement PR^{3}OCoM Tracker at 10 sites and Train PRS administrator(s)

Specific Aim 3: Pilot the PR^{3}OCoM system at each site for 9 months

Specific Aim 4: Measure qualitative and quantitative outcomes of the PR^{3}OCoM system

PR^{3}OCOM Supplement Sites

1. Yale
2. Oregon
3. Tufts
4. Johns Hopkins
5. Michigan
6. UCSF
7. UCSD
8. UCI
9. Cedars
10. Harbor

1. Setup up PRS institutional accounts.
2. Access to institutional email
3. Log-in credentials to PRS administrator
4. Four hours of web-based training
5. Ad-hoc 1-on-1 support
6. Monthly phone calls to assess

Universal Video & eConsent for Biobanking and Precision Medicine

October 3rd

Arash Naeim, M.D. PhD

Refresher

- NCATS Supplement was awarded to UCLA as lead site, in collaboration with UCSD, UCI, UCSF, and UCD for developing and implementing a biological samples universal video eConsent for Biobanking and Precision medicine.
- UCLA's developed video consent approach that is currently live across the hospital and clinics was used as guide for the other UCs to pilot.
- For most pilots were completed this summer

Accomplishments across UCD, UCI, UCSD, UCSF

- All sites received IRB approval to pilot a eConsent and animated video on iPads at pilot locations.
- Pilot locations vary across sites: Cancer Centers (UCD), Phlebotomy Clinics (UCSF), Center of Clinical Research (UCSD), Clinical Trials Unit (UCI).
- Most sites were able to GoLive with their pilots and consent patients. UCD Go Live is November 14th.
- UCI and UCSD piloted using UCLA version of the consent.
- UCSF developed their own animated video consent
- UCD developed their own as well using adapted language and style from UCSF and UCLA video consents

Metrics across UCI, UCSD, UCSF

	Yes to Remnant/Extra Sample	NO to both	Total patient consented
UCSD	**77**	**17**	**94**
UCI	**34**	**4**	**38**
UCSF	**44**	**6**	**50**

Future Contact opt in rate:
UCI 76%
UCSD 73%

Learning Lessons across UCD, UCI, UCSD, UCSF

- Early engagement with Regulatory Compliance
- Clinical I.T. is critical to integration of process
- Solicit stakeholder engagement at onset
- Widespread recognition that eConsent is an essential component of Precision Medicine
- Animated video style is effective; patients and other stakeholders love it
- Enhanced capacity for making video accessible to diverse audiences
- UC campus contexts are unique; institutional context matters a lot
- Opt- in rate is high, still ROI model is needed for collecting and storing the research samples for all patients.

How has UCLA expanded in the last year its Universal Consent for Precision Health efforts?

- Over 31,000 UCLA patients have gone through the consenting process.
- We are live at 12 physical locations and MyChart
- Plan to expand consenting efforts to UCLA satellite clinical labs across LA County
- Collected over 12,000 samples
- Going live with a return of results survey in October
- Gearing up to roll out an educational campaign around Precision Health and the Universal Consent

Study Activation Project Plan

Maggie Lindenbaum

Director, Coordination Services & Education

Study Activation Team

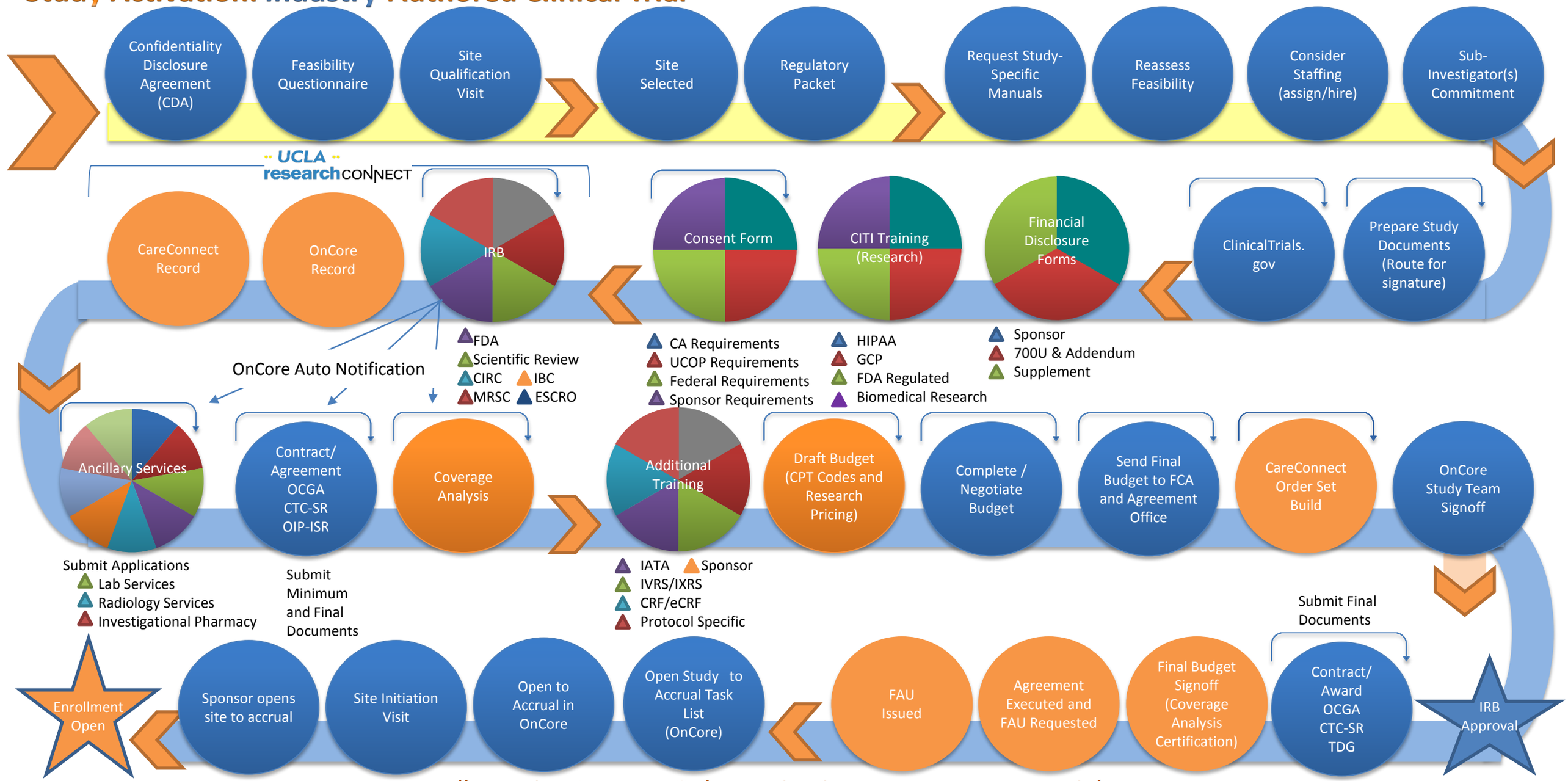
UCLA | Office of Clinical Research

Clinical and Translational Science Institute

Common Questions from Investigators

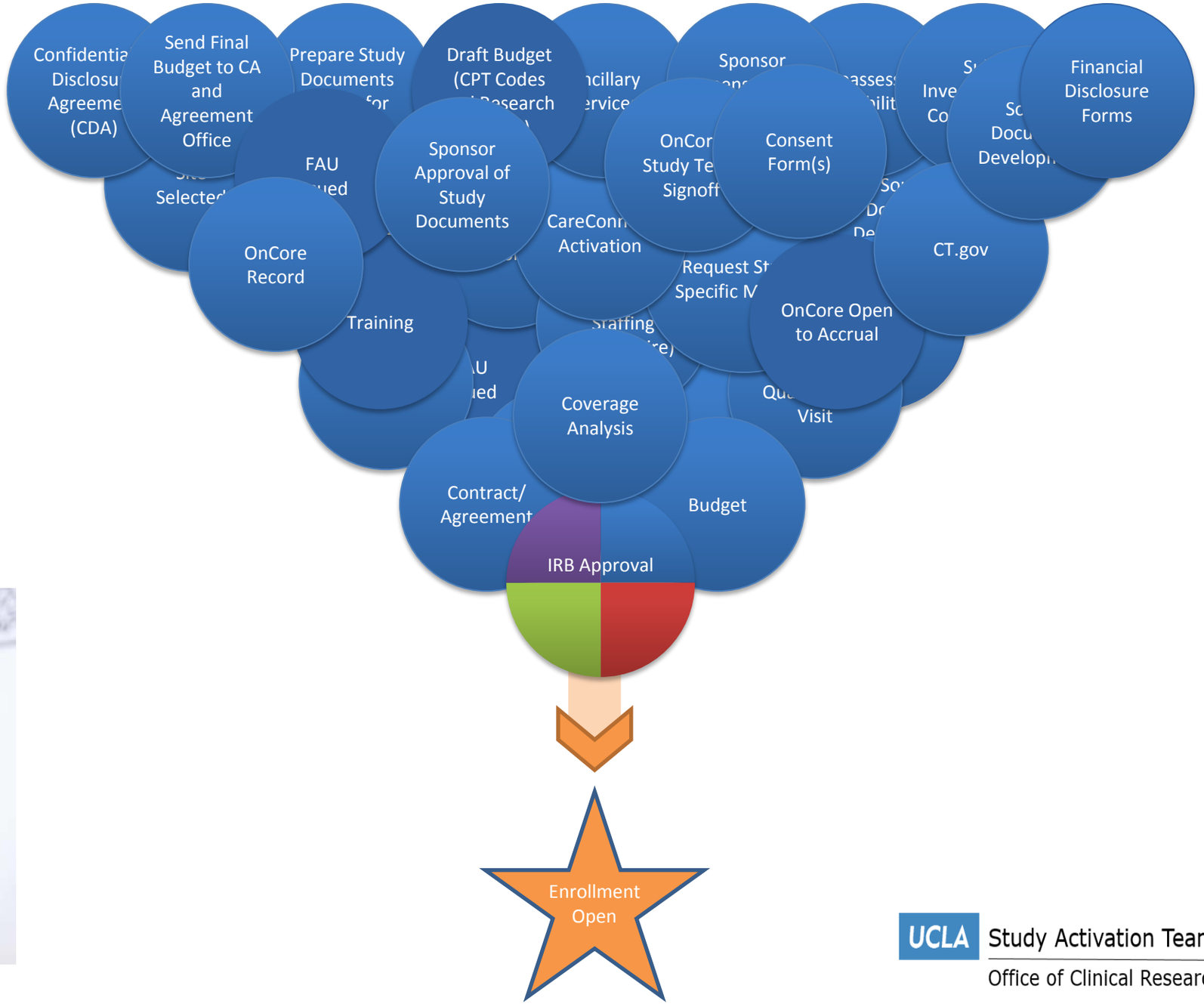
- How do I identify all of the study activation steps?
- How do I track the study activation process and stay on target?
- How can I minimize hurdles to study activation?
- Patients are waiting. When can I start screening?

Study Activation: Industry-Authored Clinical Trial



Illustrative Purposes Only – activation process not sequential

Study Activation
when there is no transparency



UCLA Study Activation Team
Office of Clinical Research

Study Activation
Key Considerations

UCLA Study Activation Team
Office of Clinical Research

- Identify Steps
- Track Progress
- Minimize Hurdles
- Project Open to Enrollment Date

Study Activation Progress Plan - General

UCLA Study Activation Team
Office of Clinical Research

Project Plan General

UCLA Study Activation Team — Office of Clinical Research

IRB #:	12-001234
Sponsor:	Enterprise
Protocol #:	NCC1701
PI:	Picard
Short Title:	Enterprise NCC1701 Irumodic Syndrome
Last update:	7/11/18

IDENTIFY

CDA, Feasibility, Qualification
Site Selection Letter Received
UCLA Startup Letter to Sponsor
Full Reg Packet Received
ICF to Sponsor

Study Submissions:
IRB Application
Committee Applications
Ancillary Applications
Contract Min Docs
Budget Build Started

Budget & Contract Negotiations initiated with Sponsor

Budget Finalized
UCLA IRB Approval

Contract Executed

Site Initiation Visit
Open to Enrollment

Week 1 | **Week 4** | **Week 8-10** | **Week 11** | **Week 12-13**

SQV | Site Selection Finalized, Receive Regulatory Packet & Study Manual | Study Questions for PI & Sponsor to Provide | Develop ICF/Assent | Sponsor ICF Review

IRB Application Prep | IRB Review and Release of Notice of Approval | Approval

SRC Application Prep | SRC Review and Release of Notice of Approval

Other Committees | Other Committee Reviews and Release of Notice of Approval

Ancillary Application Prep | Ancillary Services Review and Release of Notice of Approval

Sponsor Budget Template Received

Contract (SOW) Template Recieved

Intake | Calendar Build | Coverage Analysis | Coding & Research Pricing | Budget Out | Add Admin Costs to Budget Out | Budget Negotiation | Budget In | Research Quality | Budget Signoff | Study Team Signoff | Research Quality | Final Budget Signoff

Min Docs Submitted | Contract Review | Contract Negotiations | Final Docs Submitted | Contract Finalized | Contract Routed for PI Signature | Contract Signed | Fund # Issued

CareConnect (EHR) SmartSet Build

Requisition Forms Available

Open To Accrual Signoff

CareConnect Activation

Regulatory Document Collection, Training Completion, Clinical/Procedure Unit In-Service, Sponsor Requirements for Site Readiness Fullfilled | Site Readiness | SIV | Spon. Auth

Target: Rapid Study Startup of Industry Supported studies < 90 days from IRB submission to OnCore Open to Accrual

Tip: A full regulatory packet must include protocol, sponsor ICF template, final or at least functional drafts of study manuals (i.e., lab manual, pharmacy manual, radiology manual, manual of operations, etc.). These documents are required for IRB new study application, ancillary application submissions and budget development.

LEGEND: ICF = Informed Consent; RQ = Research Quality; ST = Study Team; CC = CareConnect; FB = Final Budget; OTA = Open to Accrual (OnCore Protocol Status); SQV = Site Qualification Visit; SIV = Site Initiation Visit

Study Activation Progress Plan - Milestones

UCLA Study Activation Team
Office of Clinical Research

Project Plan with Critical Study Startup Milestones

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Progress Tracker

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

	CONTRACT	DATE	DONE
0	Agreement received:	2/1/18	✓
1	Full Regulatory Packet	2/1/18	✓
2	Minimum Documents:	2/3/18	✓
3	Redline Out:	2/16/18	✓
4	Terms Finalized:	3/30/18	✓
5	Final Documents:	4/8/18	✓
6	Contract sent to PI for Signature (Partially Executed)	4/9/18	✓
7	Contract sent to Sponsor for Signature (Partialy Executed)	4/12/18	✓
8	Contract Signed:	4/15/18	✓
29	Fund Issued:	4/18/18	✓

	BUDGET	DATE	DONE
9	OnCore Record Created:	1/25/18	✓
10	Intake:	1/25/18	✓
11	OnCore Build:	2/1/18	✓
12	Ancillary Notifications:	1/28/18	✓
13	Submission to Ancillaries:	1/30/18	✓
14	Ancillary Notice of Approvals:	2/13/18	✓
15	Coverage Analysis:	2/15/18	✓
16	Coding:	2/18/18	✓
17	Budget Out:	2/20/18	✓
18	Budget In:	3/24/18	✓

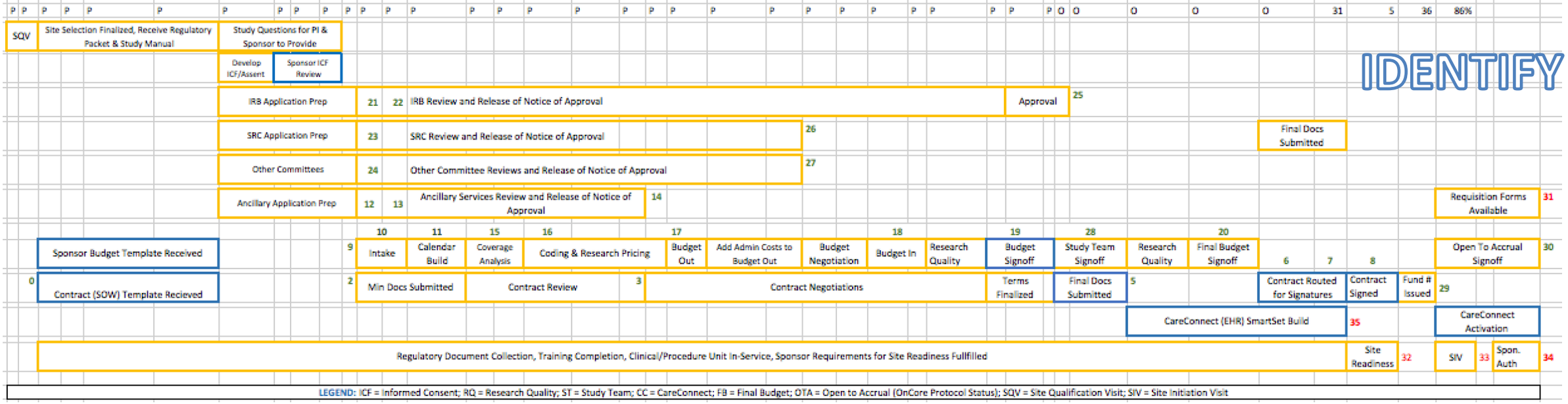
	RESEARCH QUALITY	DATE	DONE
19	Budget Sign off:	3/31/18	✓
20	Final Budget Sign off:	4/6/18	✓

	IRB	DATE	DONE
21	Pre-IRB Submission:	1/26/18	✓
22	IRB Submission:	3/1/18	✓
23	ISPRC-SRC Submission	1/26/18	✓
24	Committee Submissions:	1/26/18	✓
25	IRB Approval:	3/28/18	✓
26	ISPRC-SRC Approvals	2/23/18	✓
27	Committee Approvals:	2/23/18	✓

	FINAL STEPS	DATE	DONE
28	Study Team Sign off:	4/3/18	✓
30	Open to Accrual:	4/21/18	✓
31	Ancillary Requisitions:		✗
32	Site Readiness		✗
33	Site Initiation Visit		✗
34	Sponsor Authorization		✗
35	CC SmartSet Build		✗

TRACK

IDENTIFY



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Study Activation Progress Plan - Report

UCLA Study Activation Team
Office of Clinical Research

Study Activation Progress Report

UCLA Study Activation Team, Office of Clinical Research

IRB #:	12-001234
Sponsor:	Enterprise
Protocol #:	NCC1701
PI:	Picard
Short Title:	Enterprise NCC1701 Inumodic Syndrome

Target IRB Submission:	2/1/18		
Target Open Enrollment:	5/3/18	13.0	wks
Full Regulatory Packet:	1/1/18		
Actual IRB Submission:	3/1/18		
Projected Open Enrollment:	6/11/18	18.6	wks

Legend	
RA: Review and Approval	Calculation
P: Process	Actual Data from OnCore
D: Document	Manual Entry
ST: Study Team	Has Dependencies

Instructions: Update the light blue cells in the dark blue columns as tasks are started, submitted and completed/approved to track study activation progress in real time. The grey cells are automatically updated to reflect the current data imported into the oncore tab.

Study Startup Tasks			Target Dates		Actual Dates based on OnCore Data		Task Progress					
Milestone #	Task Type	Description	Start Date (Submission Date)	Completion Date (Approval Date)	Start Date (Submission Date)	Completion Date (Approval Date)	Not initiated	In progress	Completed	Overall	PI Action Required	Note
		IRB and Committee Approvals	Submit to ancillaries within 1 wk of IRB									
25	RA	New Study IRB Approval	2/1/18	5/24/18	3/1/18	3/28/18			x	✓		
26	RA	Internal Scientific Review Approval	2/4/18	3/4/18	1/26/18	2/23/18			x	✓		
27	RA	Medical Radiation Safety Approval	2/4/18	3/4/18	3/1/18	2/23/18			x	✓		
27	RA	Conflict of Interest Review Approval	2/4/18	3/4/18	1/26/18	2/23/18			x	✓		
27	RA	Institutional Biosafety Approval	2/4/18	3/18/18	1/26/18	3/9/18			x	✓		
27	RA	Embryonic Stem Cell Research Oversight	2/4/18	3/18/18	1/26/18	3/9/18			x	✓		
27	RA	Value Analysis Approval	2/4/18	3/4/18	1/26/18	2/23/18			x	✓		
27	RA	Clinical Engineering Approval or Acceptance	2/4/18	3/4/18	1/26/18	2/23/18			x	✓		

Target Turnaround		Actual Turnaround		±
Target Turnaround		Actual Turnaround		
16	weeks	4	weeks	-8
4	weeks	4	weeks	-1
4	weeks	-1	weeks	-1
4	weeks	4	weeks	-1
6	weeks	6	weeks	-1
6	weeks	6	weeks	-1
4	weeks	4	weeks	-1
4	weeks	4	weeks	-1

Responsibility Matrix and Resources								
Responsible For Task Start	Task Started When	Task Completed when:	Study Team Contact	Study Team Contribution (Tips and Best Practices)	UCLA Office Acronym	UCLA Office Full Name	UCLA Office Contact (email address and website)	Note
Study Team vs. UCLA Office								
Study Team	Submission of New	IRB issues aprpoval notice	name of	Respond to IRB	OHRPP	Office of Human	Owner (IRB Staff) named on	
Study Team	SRC will email if	SRC issues approval notice	name of	Respond to SRC	CTSI SRC (non-	Scientific Review	ctsisrc@mednet.ucla.edu	
Study Team	Section 8.11	MRSC issues approval	name of	Connect with	MRSC	Medical Radiation	mrsc@mednet.ucla.edu	
Study Team	Submission of	CIRC issues letter with final	name of	CIRC meets once a	CIRC	Conflict of Interes	circ@mednet.ucla.edu	
Study Team	Submission of new	IBC issues approval notice	name of	Send blank IBC	IBC	Institutional Bios	ibc@mednet.ucla.edu	
Study Team	Submission of	ESCRO issues approval	name of	Confirm with ESCRO if	ESCRO	Embryonic Stem C	escro@mednet.ucla.edu	
Study Team	Submission of	VAC issues approval notice	name of	Required if	VAC	Value Analysis Co	vac@mednet.ucla.edu	
Study Team	Email summary of	Clinical Engineering issues	name of		CE	Clinical Engineeri	vemilian@mednet.ucla.edu	

IDENTIFY

TRACK

MINIMIZE HURDLES

Study Activation Progress Plan - Report

UCLA Study Activation Team
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IDENTIFY STEPS

Study Activation Progress Report

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Study Activation Progress Plan - Report

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TRACK PROGRESS

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Actual Dates based on OnCore Data		Task Progress						Target Turnaround		Actual Turnaround		
Start Date (Submission Date)	Completion Date (Approval Date)	Not initiated	In progress	Completed	Overall	# Action Required	Note	Target Turnaround		Actual Turnaround		=
3/1/18	3/28/18			x	✓			16	weeks	4	weeks	-8
1/26/18	2/23/18			x	✓			4	weeks	4	weeks	-1
3/1/18	2/23/18			x	✓			4	weeks	-1	weeks	-1
1/26/18	2/23/18			x	✓			4	weeks	4	weeks	-1
1/26/18	3/9/18			x	✓			6	weeks	6	weeks	-1
1/26/18	3/9/18			x	✓			6	weeks	6	weeks	-1
1/26/18	2/23/18			x	✓			4	weeks	4	weeks	-1
1/26/18	2/23/18			x	✓			4	weeks	4	weeks	-1

Study Activation Progress Plan - Report

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MINIMIZE HURDLES

Responsibility Matrix and Resources

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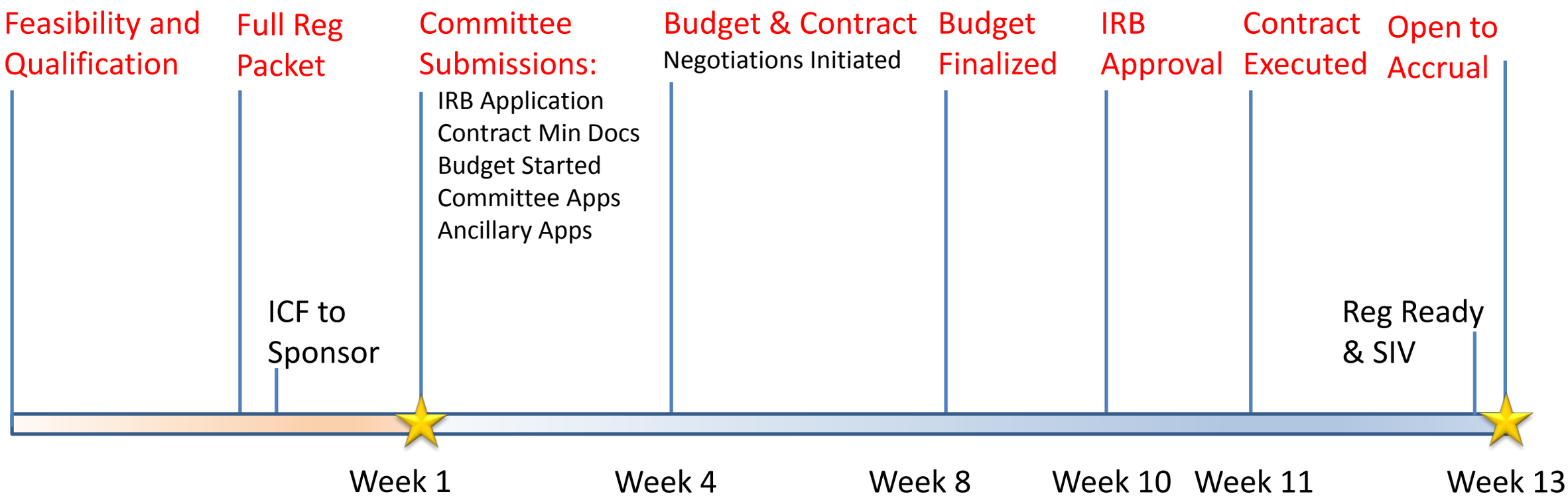
Project Open to Enrollment Date

Study Activation Team – 90-day Study Activation Model

UCLA Study Activation Team
Office of Clinical Research

Study Activation in 90 Calendar Days

From IRB Submission to Open to Accrual



Further Development

1. Development phase: Define turn around times for all tasks
2. Testing phase: test functionality using expected cases
3. Pilot phase: track startup timelines of real studies
4. Use project plan to inform dashboards and analytics
5. Align with questionnaire to enable self-service Project Plans
6. Adapt to other workflows
    - HemOnc
    - IRB Reliance
    - Investigator Initiated Studies

THANK YOU

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