CTO – SOP 3.6

HANDLING OF AMENDMENTS AND REVISIONS

INTRODUCTION AND PURPOSE

The principal investigator (PI) is the individual of record who assumes the authority and responsibility for the conduct of a clinical study. By signing a Food and Drug Administration (FDA) Form FDA 1572 (*Statement of Investigator*), the PI agrees to comply with the conditions required by FDA for use of investigational articles. The PI has the authority to delegate responsibility to individual members of the research team; however, the PI is ultimately responsible for the overall conduct of the study.

This standard operating procedure (SOP) describes the UNM-Cancer Center and New Mexico Cancer Care Alliance (NMCCA) processes for review and approval of protocol amendments and formal notification of study teams in order to ensure compliance with regulatory guidelines and to protect the safety and well-being of study subjects.

SCOPE

This SOP defines the responsibilities of the Protocol Review and Monitoring Committee (PRMC) Chair, , Clinical Trials Office managers and regulatory staff for tracking and updating study protocol revisions and amendments for participating investigative sites. It identifies administrative accountability as well as flow of documentation to individual team members for fulfilling regulatory and clinical and federal website reporting requirements stipulated by Federal, sponsor and local regulations and guidelines.

APPLICABLE REGULATIONS AND GUIDELINES

21 CFR 312.60	General responsibilities of investigators
21 CFR 312.62	Investigator recordkeeping and record retention
21 CFR 312.66	Assurance of IRB review
21 CFR 312.68	Inspection of investigator's records and reports
May 1997	International Conference on Harmonization; Good Clinical Practice: Consolidated Guideline
Current	UNM CC/NMCCA Data Safety Monitoring Plan (DSMP)
SOP 2.1	Assessing Protocol Feasibility

(DSMP)

SOP 2.1 Assessing Protocol Feasibility

SOP 3.1 Interactions with the Institutional Review Board

SOP 3.7 Electronic Correspondence with the Human Research Protections Office

RESPONSIBILITY

This SOP applies to the individuals involved in the management of and communications related to protocol amendments and revisions of clinical studies managed by the Clinical Trials Office. This includes the following:

- Principal Investigator
- Medical Director, Protocol Review and Monitoring Committee (PRMC)
- Regulatory Manager
- Program Manager
- Regulatory Coordinator
- Research Manager
- Clinical Trials Assistant
- Protocol-specific contacts, e.g. Imaging, Radiation Therapy investigators

PROCEDURES

Identification and receipt of revisions and amendments to study protocols

Regulatory Coordinator

Cooperative Group Process:

Each regulatory coordinator assigned to a cooperative group trial will be responsible for directly gathering and reviewing appropriate study updates for their assigned studies through NCI-governed processes. NCI study notifications received by e-mail will be forwarded to the common email address, CPDMCoordinator@salud.unm.edu for ongoing study management and cross-coverage. On a monthly basis, each assigned regulatory coordinator managing NCI trials will identify, save and log all NCI study amendments, revisions and/or updates directly from NCI cooperative group and other (CTSU) websites. Logs will be provided to Regulatory Manager or Executive Director. For trials opened through the NCI Clinical Trials Support Unit (CTSU), additional confirmation of amendment availability is necessary through the CTSU website. Following Group advance notifications, for these trials daily checks of the CTSU website for postings will be performed until amendments are

available for downloading.

All NCI protocol amendments must receive IRB approval within 90 days of availability.

Pharmaceutical and Investigator Initiated Study Process:

For pharmaceutical trials overseen by the UNM Health Sciences Center Human Research Review Committee (HRRC): receive notification by the study monitor of a new protocol amendment or revision.

For pharmaceutical trials for which the Western IRB *is* the central IRB of record: study sponsors may directly submit study amendments and revisions to the IRB, with or without notification of the UNM CC/NMCCA Regulatory Coordinator. In these instances, the Regulatory Coordinator must coordinate with the study monitor and/or the WIRB to obtain approved study documents

or pharmaceutical trials for which the WIRB is *not* the central IRB of record but for which UNM CC/NMCCA has obtained WIRB approval: receive study amendments and summaries of changes from the study monitor. Prepare and submit study amendments and associated documentation according to current WIRB processes.

For investigator initiated trials initiated by UNM CC/NMCCA PIs: receive electronic study amendments from the PI. Ensure current version date is included on title page of new document, or update as necessary.

For investigator initiated trials initiated by institutions outside the UNM CC/NMCCA: receive study amendments from designated external contact.

Implement administrative or scientific review

Regulatory Coordinator	For all study amendments *not* submitted to the IRB of record by the sponsor on behalf of our sites: Electronically submit a completed Protocol Review

and Monitoring Committee (PRMC) Amendment Disposition/Change form with a copy of the study amendment and brief summary of changes to either the Regulatory Manager (administrative changes per the current DSMP) or the NMCCA or CPDMI Medical Director (scientific changes) Include specific amendment, revision or addenda numbers and version dates on the form.

Create a new Amendment tracking form in the electronic database for tracking and reporting purposes. Update form immediately upon submission to IRB and again upon receipt of IRB approval.

Changes Involving More Than Minimal Risk: Temporarily Closing the Study to Accrual

Regulatory Coordinator
Regulatory Manager
PI (as necessary)

1) ***Industry trials:*** the sponsor is to identify whether or not the study is to be temporarily closed to accrual during processing of the study amendment or revision.

2) ***Investigator-initiated trials:*** the study PI is to identify whether or not the study is to be temporarily closed to accrual during processing of the study amendment or revision.

3) ***NCI sponsored trials:*** once a study amendment is available, determine if it includes changes involving **more than minimal risk. Refer to cooperative group comments, where applicable on study notifications.**

If yes: *immediately* update the study status in the electronic database and send out a notification to all participating UNM CC/NMCCA sites (PI and study team)and other individuals as directed to alert them to the need to temporarily cease study accruals.

If no: do not temporarily close the study to accrual.

Administrative changes Review the amendment and, provide a recommendation in electronic format for all administrative amendments or revisions prior

		to IRB submission
	Regulatory Manager	**Scientific w/wo administrative changes:** For amendments involving changes to study design, updates to risk assessments, etc: log the amendment in the electronic database and forward the packet to the Medical Director. If the Medical Director is the PI of the study, forward the packet to the PRMC Chair.
Implement IRB approved revisions	NMCCA or CPDMI Medical Director	Review the amendment and note decision on the Disposition form. Return to the assigned regulatory coordinator.
	Regulatory Coordinator	Upon receipt of PRMC approval: ***For investigator initiated studies:*** submit amendments involving scientific changes with updated consent form to Nurse Manager for review and approval.
	Nurse Manager	Review the institutional trial scientific amendment and, as needed, updated consent document. Provide a recommendation in electronic format to the assigned regulatory coordinator. Modify (for UNM CC only) patient care plan as necessary forward documents to the study PI for review and approval.
	Regulatory Coordinator	Submit materials to the IRB of record. Enter WIRB tracking number in electronic clinical trials management system. *Upon receipt of approved documents:*

Upload approved documents to the electronic database and remove all expired versions of documents. Save all versions to Regulatory hard drive.

Update study statuses in the electronic database as necessary.

Send **written** notification of approval to **all** study site PIs and full research teams, the Regulatory Manager, Quality Assurance Manager, Protocol Monitoring Committee Coordinator, Nurse Manager and other individuals as directed.

Include direction regarding the potential need to re-consent or verbally notify study participants. Include approved consent form documents where applicable, with summary of changes and/or edited versions of consent documents as attachments.

Maintain copies of the PRMC, IRB and other approval letters and electronic mail and approved documents in the regulatory binder(s).

Attachments:

UNM CC/NMCCA Protocol Review and Monitoring Committee Amendment/Change Disposition (v8, December 2010)

David C. Hurr

CPDMI Medical Director

2/17/12

Date