

**HARVARD CANCER CONSORTIUM
POLICIES FOR HUMAN SUBJECT RESEARCH**

TITLE: HCC Investigator-Sponsored Multi-Center Research		
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1. POLICY STATEMENT:

The HCC Sponsor-Investigator, Coordinating Center and external sites collaborating in HCC Investigator-Sponsored Multi-Center research must comply with established HCC standards, as well as applicable local and federal regulatory requirements.

2. BACKGROUND:

None

3. RESPONSIBLE PERSONNEL:

- 3.1. HCC Sponsor-Investigator
- 3.2. Coordinating Center Personnel
- 3.3. External Site Personnel
- 3.4. Office of Data Quality (ODQ) Director
- 3.5. Office for Human Research Studies (OHRS) Director

4. DEFINITIONS:

- 4.1. **Coordinating Center:** An individual, group, company or organization designated and supervised by the HCC Sponsor-Investigator to perform administrative tasks related to the HCC Multi-Center Data and Safety Monitoring Plan (DSMP) and maintain regulatory documents that demonstrate compliance of the HCC Sponsor-Investigator, participating institutions, and clinical trial monitors with all applicable regulatory requirements. Typically, the research team at the institution of the HCC Sponsor-Investigator serves as the Coordinating Center for the research.
- 4.2. **HCC Sponsor-Investigator:** The HCC Investigator that takes responsibility for the initiation, management, and conduct of the HCC multi-center protocol at all research locations. For National Cancer Institute (NCI) Cancer Therapy Evaluation Program (CTEP) protocols this person is called the Protocol Chair, and this policy will apply for any applicable responsibilities not assumed by NCI/CTEP and/or its support contractors (CTIS and Theradex).
- 4.3. **Multi-center Research:** A protocol where one or more external sites collaborates with HCC in research where an HCC investigator is the sponsor (HCC Sponsor-Investigator).

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- 4.4. **External Site:** A non-HCC institution that collaborates with HCC in the conduct of the protocol. This institution acknowledges the HCC sponsor-investigator as having ultimate authority and responsibility for the overall conduct of the research.

5. POLICY:

- 5.1. Any external site engaged in HCC human subject research is subject to audit by the HCC Office of Data Quality (ODQ). HCC sponsor-investigators must ensure that any institution involved in HCC research in this capacity:
- 5.1.1. Demonstrate compliance with applicable HCC, local, and federal requirements through institutional policies. These requirements include, but are not limited to, Human Subject Protection and Good Clinical Practice training compliance for study personnel.
 - 5.1.2. Upon request, provide applicable institutional policies to the sponsor-investigator, Coordinating Center, HCC ODQ, and HCC Office for Human Research Studies (OHRS) for review.
- 5.2. HCC sponsor-investigators must obtain institutional multi-center approval from their home institution for all multi-center research where the external site(s) are involved in one or more of the following:
- 5.2.1. The recruitment of, or administration of an intervention to, human subjects
 - 5.2.2. Collection and/or review of data that is identifiable or may be made identifiable by the investigator at that site
- 5.3. When institutional multi-center approval is required, the Coordinating Center must submit documentation of this approval to OHRS.
- 5.3.1. The institutional multi-center approval process is intended to ensure that the Sponsor-Investigator will be able to successfully fulfill his or her responsibilities as outlined in this policy. The approval process is set by each HCC institution and may involve additional requirements in accordance with institutional policies.
 - 5.3.2. An HCC sponsor-investigator planning to conduct multi-center research for the first time will be required to complete appropriate training as designated by the ODQ prior to the initiation of research at an external site.

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This requirement may be waived at the discretion of the ODQ Director for trials that are deemed minimal risk by the IRB.

- 5.4. The HCC sponsor-investigator is ultimately responsible for oversight of research and compliance in accordance with all applicable regulatory requirements and HCC policies at all participating sites. This includes, but is not limited to the coordination, development, submission and approval of the multi-center protocol, protocol-specific HCC multi-center DSMP, and any changes to the research.
- 5.5. The HCC sponsor-investigator works with the designated Coordinating Center to ensure the necessary resources are in place, including dedicated research staff, to fulfill his or her responsibilities as outlined in this policy. Resources may include, but are not limited to, a project manager, additional study coordinator(s) and/or a Contract Research Organization (CRO).
- 5.6. The responsibilities of the HCC sponsor-investigator, or Coordinating Center on behalf of the sponsor-investigator, include:
 - 5.6.1. Selecting qualified investigators and external sites that have adequate resources to conduct the protocol.
 - 5.6.2. Obtaining Institutional Review Board (IRB) approval for all sites that will be involved in the research prior to the sites' research initiation. See OHRS Guidance on Single IRB Review Processes and the HCC FAQ - NIH sIRB Mandate.
 - 5.6.3. Ensuring investigational agent(s) will be supplied to each participating site (when applicable).
 - 5.6.4. Ensuring inter-institutional agreements/contracts are in place, when necessary, to address how participant information, research data, and/or research samples are sent between external sites and the Coordinating Center (if applicable), and financial arrangements.
 - 5.6.5. If central specimen collection is planned, ensuring a process is in place to track samples and prevent the collection of specimens without informed consent.
 - 5.6.6. Obtaining documentation of protocol-specific training (per EDU-100) from all participating site research team members. For external sites participating in multi-center trials, training should include relevant HCC

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policies and procedures, the Data and Safety Monitoring Plan, conduct of the protocol and research procedures, serious adverse event and deviation/violation reporting requirements, and data collection methods.

- 5.6.7. Creating and implementing a plan to monitor accrual that includes specific accrual requirements for each external site and pre-defined actions for sites not meeting their accrual goals.
- 5.6.8. Creating the model informed consent document and ensuring each external site's IRB-approved consent form complies with the [HCC Multi-Center Model Consent Language](#) and HIPAA requirements.
- 5.6.9. Establishing and documenting regular communication with all external sites and research team members to discuss research progress and protocol/subject-related issues in accordance with the multi-center DSMP.
- 5.6.10. Ensuring all participants are registered with HCC per REGIST-101, when applicable.
- 5.6.11. Distributing protocol and informed consent document updates to all sites as needed and maintaining copies of IRB approvals from all external sites.
- 5.6.12. Promptly submitting all SAEs and deviations/violations to the IRB and/or other regulatory authorities when they meet the appropriate reporting requirements.
- 5.6.13. Distributing SAE safety reports and relevant updates to safety information to each external site.
- 5.6.14. Ensuring that each external site maintains up-to-date and comprehensive regulatory documents as needed to demonstrate compliance with all applicable regulatory requirements and HCC policies.
- 5.6.15. Developing and implementing an appropriate multi-center DSMP, as applicable. Interventional protocols involving a drug, device, biologic, radiation or surgery (including surgical biopsies) that are determined to be greater than minimal risk must use the HCC Multi-Center Data and Safety Monitoring Plan Template.

APPLICABLE REGULATIONS & GUIDELINES:

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21 CFR 50 – Protection of Human Research Subjects
21 CFR 54 – Financial Disclosure by Clinical Investigators
21 CFR 56 – Institutional Review Boards
21 CFR 312 - Investigational New Drugs – Drugs for Human Use
21 CFR 812 - Investigational Device Exemptions
45 CFR 46 – Protection of Human Subjects
FDA Industry Guidelines and Information Sheets
FDA Compliance Policy Guidance Programs: 7348.809, 7348.810, and 7348.811

6. RELATED REFERENCES:

International Conference on Harmonisation – E6

7. RELATED FORMS AND TOOLS:

MULTI-OP-1: Review Process for Investigator-Sponsored Multi-Center Research
HCC Multi-Center Data and Safety Monitoring Plan Template
HCC Institutional Multi-Center Approval Form
OHRs Policy: HCC and the NIH sIRB Requirement

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