Marshfield Clinic

IRB Review of Protocols in Long-Term Follow-Up (LTFU)

1. SCOPE

1.1. System Wide

2. DEFINITIONS & EXPLANATIONS OF TERMS

2.1. **Intervention:** A process or interaction that is the focus of a clinical study. Interventions include drugs, medical devices, procedures, vaccines, and other products that are either investigational or already available. Interventions can also include noninvasive approaches, such as surveys, education, and interviews.

2.2. **Treatment:** Medical Care or intervention given to a patient for a health condition. The term is used extremely widely in the context of clinical trials. It includes use of placebos, palliative care, even the use of "no treatment" if this is one of the treatment regimens being evaluated.

2.3. **Umbrella Protocol**: MCRF IRB protocol under which protocols are transferred, once LTFU criteria are met. NCORP Long-Term Follow-Up Umbrella protocol (RED10815).

Of note these were previously organized by research bases with the following IRB approval and have since been terminated: COG (NIC11298), CTSU (MER10107), ECOG (BAN10698), GOG (EDD11398), MD Anderson (BAN10798), NSABP (HOE20398), SWOG (BAN101896G), RTOG (BAN10898, OLD10198)

3. PURPOSE & BACKGROUND

3.1 PURPOSE

To define when National Cancer Institute's (NCI) prior Clinical Trials Cooperative Group protocols and the new National Clinical Trials Network (NCTN) protocol may be transferred to the IRB-approved Long-Term Follow-Up (LTFU) Protocol for the purpose of ongoing IRB annual continuing review and to define the related procedures.

3.2 BACKGROUND

The Office of Human Research Protection (OHRP) published FAQs state that continuing review of IRB-approved protocols is required so long as , " a research study is ongoing, that is, until research related interactions and interventions with human subjects or the obtaining and analysis of identifiable private information described in the research plan are complete."

1993 correspondence documents a conversation between Marshfield Clinic Research Foundation (MCRF) Office of Research Review, currently named, Office of Research Integrity & Protections (ORIP) staff and OHRP. It states OHRP's position that it is reasonable to, "review all CCOP protocols in Long Term Follow Up at the same time." The benefit is the

elimination of the need for individual reports for each protocol, by allowing one continuing review report for protocols transferred to the one LTFU Umbrella Protocol.

After the implementation of the Marshfield Clinic Research Foundation (MCRF) LTFU "umbrella" protocols two of the NCI Clinical Trials Cooperative Groups (Children's Oncology Group and Eastern Cooperative Oncology Group) soon thereafter activated LTFU Protocols. The Protocol was available to Cooperative Group sites that had not created their own LTFU umbrella protocols. The entry criteria for the two protocols are very similar and are the foundation upon which the MCRF LTFU "umbrella" protocols were based.

Based upon this background information, MCRF IRB's practice became to allow these protocols to be transferred to a Clinical Trials Cooperative Group specific umbrella protocol for continuing review as long as a given study was close to accrual with all local study participants having completed or permanently stopped protocol treatment.

March 1, 2014, NCI transformed its longstanding Cooperative Groups program into the new National Clinical Trials Network (NCTN). The nine former adult Cooperative Groups have consolidated into for adult groups in the NCTN. In addition, as was the case under the previous clinical trials system, another large group is focused solely on childhood cancers. The structure also includes a Canadian Collaborating Clinical Trials Network award. The five US Network Groups are: Alliance for Clinical Trials in Oncology, ECOG-ACRIN Cancer Research Group, NRG Oncology, SWOG and Children's Oncology Group (COG). The Canadian Network Group is: National Cancer Institute of Canada – Clinical Trials Group (NCIC-CTG).

NCI Community Oncology Program (NCORP) is a new program that builds on NCI's previous Community Clinical Oncology Program (CCOP) which is associated to the new NCI National Clinical Trials Network Structure. Based upon the above NCI transformation a single Long-Term Follow-up Umbrella protocol is now in place for the NCORP studies. This umbrella protocol supersedes the former individual Community Clinical Oncology Program (CCOP) umbrella protocols that were organized by Cooperative Groups.

In addition, effective August 1, 2014 the NCI approved the funding plan for the Wisconsin NCI Community Oncology Research Program (WiNCORP) consortium consisting of Gundersen Health System, St. Vincent Regional Cancer Center and Marshfield Clinic Health System.

4. DOCUMENT BODY

4.1 Eligible protocols may be transferred to NCORP Long-Term Follow-Up Umbrella Protocol when all of the following criteria are met:

(a) The protocol is permanently closed to study participant accrual
(b) All study participants registered locally have completed or permanently discontinued protocol treatment and visits

(c) There are study participants in follow-up and research data collection and or analysis is ongoing
(d) MCRF IRB is the IRB of record for the protocol

4.2 Continuing review of umbrella protocols will be conducted according to criteria cited in the IRB policy "Continuing Review"

4.3 IRB may review individually any study from the umbrella that it deems necessary

4.4 Limited Reporting is required by the IRB for protocols transferred under the NCORP LTFU Umbrella Protocol

a. Unanticipated Problems should be reported only if they have the potential to affect study participants in the LTFU phase of the protocol

b. The principal investigator (PI) and delegated staff are required to report all instances of non-compliance that occur on an IRB-approved research study

c. Amendments will be processed if they reflect local changes, such as PI. However, protocol amendments intended for sites with study participants currently being treated on protocol will not be processed. Consent form changes will not be made to any protocol being followed under the LTFU umbrella.

5. PROCEDURE BODY

5.1 To request transfer of an individual protocol to NCORP LTFU Umbrella Protocol, Appendix A of the IRB Continuation Request Form must be completed. If the IRB determines the required criteria are met, the study will be transferred to the NCORP LTFU Umbrella Protocol for its next continuing review.

5.2 An IRB Continuation Request will no longer be generated for that individual protocol. The transferred protocol will instead appear on a research database report reflective of all the protocols under the NCORP LTFU Umbrella Protocol. The report of all the transferred protocols must be attached to the IRB Continuation form submitted for the NCORP LTFU umbrella protocol.

5.3 Continuing Review of NCORP LTFU umbrella protocol will be conducted via Expedited Review Category 8, "Research is permanently closed to the enrollment of new study subjects, all subjects have completed research-related interventions, and research remains active only for long-term follow-up subjects."

5.4 Protocols under the NCORP LTFU Umbrella protocol can be terminated at the time of the NCORP LTFU Umbrella Protocol 's next scheduled continuing review when all of the following are met:

a. All study participants on this study have completed study intervention(s) and follow-up activities; OR no study participants were enrolled
b. There will be no further activities for this study (this includes recruitment, enrollment, data collection, data analysis, data submissions, etc.).

5.5 An "IRB End IRB Oversight Request" form for the individual protocol being terminated must accompany the "IRB Continuation Request". The individual protocol will then be

removed from the umbrella's NCORP LTFU Umbrella Protocol report. An IRB Termination letter will be generated for the individual protocol along with the NCORP LTFU Umbrella Protocol IRB Continuing Review Letter. If it is not possible to wait until the next scheduled continuing review, an IRB Continuation Request Form and the End IRB Oversight Form may be submitted to the IRB at an earlier date and the NCORP LTFU Umbrella Protocol's continuing review will take place ahead of schedule.

6. ADDITIONAL RESOURCES

6.1 References:

- None

6.2 Supporting documents available:

- IRB Continuation Request
- IRB End IRB Oversight Request

7. DOCUMENT HISTORY

Version No.	Revision Description
1.0	New Document in Document Control transferred from Policy & Handbook Library #3359.0; Revisions made throughout document relative to Research program Cooperative Group name changes & research base name changes. Add background info for 2014. Revised definitions to be more comprehensive. Revised procedure for termination of protocol in LTFU. Added applicable IRB submission forms.
2.0	
3.0	

8. DOCUMENT PROPERTIES

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