

Working with Northwestern on an Investigator-Initiated Trial Participating Site Acknowledgment

All sites that participate in clinical trials initiated by Northwestern University (NU) must be familiar with and comply with all data submission, monitoring, and internal audit expectations for NU investigator-initiated trials (IITs). The Robert H. Lurie Comprehensive Cancer Center's Data and Safety Monitoring Committee (DSMC) monitors data submission for all NU interventional investigator-initiated protocols, including data for all sites that participate in these trials.

Data for all trials must be submitted via Northwestern electronic data capture (EDC), the Northwestern Oncology Trial Information System (NOTIS). Training on NOTIS is provided via webinar or recorded video, and all staff responsible for data entry must complete the training and successfully pass a quiz as part of study activation activities.

Pilot, Phase 0, Phase I Trials - All Other Data

During the DLT period, data are generally due within 48 hours of a patient's visit. After a patient's DLT period is completed, data are generally due within 10 days of a patient's visit. Failure to submit the required data within 30 days of the due date will result in the local site's suspension of accrual for pilot, phase 0, and phase I trials. The local PI and NU PI will be notified.

Phase II & III Trials

Data is generally due within 10 days of a patient's visit. Data submitted 90 days past the due date are considered to be severely delinquent. The DSMC may suspend subject accrual for the site and study for which data are considered severely delinquent. The DSMC will provide the local PI with written notification of a suspension and will outline all the requirements the PI must fulfill to reinstate accrual privileges, or follow-up with any additional questions or requests for information. The NU PI will also be notified.

In addition to the compliance policy detailed above, if sites use the NU IRB as the IRB of record, they must also follow the adverse event reporting requirements established by the NU IRB.

If accrual privileges have been suspended, they may only be reinstated once all required data is satisfactorily submitted, and DSMC members have voted to reinstate accrual privileges for the trial. The DSMC will send written notification when accrual privileges have been reinstated.

Please note, sub-contracts executed between local sites and NU may include language that connects data submission to local site payment. If the terms of the sub-contract tie data submission to payment, and the participating site is not considered to be data compliant, payment will or will not be made according to terms dictated by the subcontract. If the affiliate will not be paid because of failure to comply with data submission requirements, the participating site will be informed of non-payment in writing.

Protocol Deviations

NU's Data Safety Monitoring Plan (DSMP) requires that all protocol deviations be reported to NU's Quality Assurance team in real time at croqualityassurance@northwestern.edu. A deviation form will be provided in NOTIS and pointed out at the site initiation visit. Any questions about this requirement should be directed to your assigned Quality Assurance Monitor.

Regulatory Documentation

A copy of all approved regulatory documents (that pertain to assigned study), should be sent to Multi-Site Research Program email address (NUAffiliates@northwestern.edu) in real time. This should include:

- All local IRB approvals
 - All IRB approved consents for your institution
 - All continuing review approvals
 - All amendment approvals
 - SAE Submissions or Unexpected/Related AEs submissions requiring submission to local IRB
 - Any protocol deviations requiring submission to local IRB
 - Action Letters requiring immediate submission to the IRB
- Up-to-Date 1572 signed by local PI
- Up-to-Date medical licenses, disclosures of financial interest, CVs for local PI and all sub-PIs listed on the 1572 (up-to-date = signed within 2 years of current date)
- Up-to-date delegation of authority (DOA) log (Any time the DOA is updated it should be sent to nuaffiliates@northwestern.edu, however, at a minimum, DOA should be reviewed and sent in annually at time of continuing review).
- Signed, scanned copy of training logs

Note: Should your site SOPs not line up with any of the requirements above, please discuss with multi-site management team at nuaffiliates@northwestern.edu prior to activation for a waiver.

Source Verification - Phase I Trials

Per the Lurie Cancer Center [DSMP](#), the QA Department source verifies eligibility for all phase I (and select pilot) IITs *prior* to patient registration and throughout a patient's course on study, as is defined by the protocol. Sites are required to scan and send all source documentation to the Quality Assurance department prior to registration. Sites are then required to send all relevant source documentation to the Quality Assurance department (or upload to NOTIS as applicable) at the completion of each cycle.

Routine Monitoring Visits

The study assigned Quality Assurance Monitor will schedule remote monitoring visits every 6-8 weeks. **At the time of monitoring visits, study teams are required to have all data entered to date and all queries addressed.** The focus of the monitoring visits is subject data (e.g. regulatory documents are not typically required). For Phase I subjects, sites are required to submit redacted medical records confirming all study procedures and results as noted above.

First Patient Audits (FPAs)

Per the Lurie Cancer Center [DSMP](#), the QA department automatically audits the first patient enrolled on a study for every participating site. This occurs once the participant reaches their first response assessment (varies per protocol, but typically after Cycles 2-4). Sites are required to send all redacted source documents via e-mail for first patient audits. Regulatory documents do not need to be sent for any type of audit unless the Northwestern central file is missing documentation that had not previously been submitted.

Semi-Annual Audits

Per the Lurie Cancer Center [DSMP](#), the Lurie Cancer Center QA department conducts and facilitates a comprehensive annual audit of all IITs. At least one patient from each trial or 10% of patient's accrued (whichever is greater) are randomly chosen to be audited. Participating sites may or may not be selected. If selected, a participating site will be notified at least 30 days prior to the audit date.

If selected, sites are required to send a flagged and organized audit shadow chart via mail by the deadline specified in e-mail from the Research Oversight Director. This e-mail will contain very specific instructions for what must be included in the shadow chart. In addition to the shadow chart, copies of drug logs and packing slips must also be sent. Regulatory documents do not need to be sent for any type of audit unless the Northwestern central file is missing documentation that

had not previously been submitted. Failure to comply with audit requirements may result in site suspension to new accrual or termination from the study.

Study Termination

Once all patients at a site go off study, and Northwestern PI and Quality Assurance Monitor confirm all data has been collected, site can request to terminate the trial. At that time, they will receive an initiation of termination email, and be required to send:

- any pending regulatory documentation
- a signed form attesting to all financial issues being resolved (provided by multi-site research team)
- completed drug logs
- any study specific drug company requirements
- a drug destruction policy (unless previously provided)
- a data retention policy (unless previously provided)
- an end of study financial disclosure form
- an end of study delegation of authority log

Once all of these documents are received and reconciled with the trial master file, the site will receive a Notice to Terminate. At that time, the site can close out the trial with their IRB. Once closed out, the IRB documentation that the study has been terminated at that site should be sent to nuaffiliates@northwestern.edu.

As the Principal Investigator, I acknowledge that I have reviewed and understand the expectations outlined above for a participating site on a Northwestern Investigator-Initiated Trial (IIT).

Local PI Signature

Date

Local PI Name [Printed]

Participating Site Name