Children's Hospital LOS ANGELES®

TEA WITH THE IRB:

TIPS FOR A SUCCESSFUL SUBMISSION TO THE WCG IRB

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Goals of the Session

- Understand the steps for submission to the WCG IRB (formerly WIRB)
- Offer solutions to making the submission process quick and efficient

Review the HSPP Website

- https://www.chla.org/research/hspp-ceded-review-checklists-and-forms
- Read the Instructions for Submitting to the WCG IRB
- Review the presentations for using the WCG IRB submission platform (Connexus)
- Review the resources available for completing the WCG IRB application form in Connexus
- Contact the CHLA HSPP office for questions about the process

Process for Submitting to WCG IRB

- Communicate with the Sponsor/CRO and CHLA Contracts & Clinical Research Office, WCG IRB Office
- Submit to the CHLA HSPP Office for Clearance
- Prepare and Submit to WCG IRB
- Things to Do After Submission to WCG IRB
- Submit an Amendment to the CHLA Ceded Review Application
- How to Manage your WCG IRB Approved Study

Communication is Key for This Process

Communication with WCG IRB:

- Look for emails from WCG after submission for missing information
- Look for emails with draft consent forms for review

Sponsor/CRO:

- Explain the steps for submitting to WCG IRB – share the CHLA instructions
- Has the study been reviewed by the WCG IRB?
- Are they the central IRB for the study?
- Who will make the submission?
- How will draft consent forms be reviewed?
- Who should WCG IRB invoice?
- Who will obtain required translations? CHLA, sponsor, WCG IRB?

CHLA Contract & Clinical Trials:

- Clinical trial budgeting – if CHLA will be invoiced make sure WCG IRB fees are in the budget
- Include translation costs if done via CHLA translation services or by WCG IRB

Communication with Sponsor – Use of WCG IRB

- Explain CHLA uses the WCG IRB for clinical trials

✓ Multi-Site Clinical Trials
✓ Industry Sponsored
✓ Industry Authored

- Presently, we have no other master agreements with any other commercial IRB (this will change in the new year!)
- If a study is approved by another commercial IRB, we still need to use WCG IRB for right now
  - Sponsors/CROs sometimes refer to this as "local IRB review"
  - You more than likely will be asked to make the submission to WCG

Communication with Sponsor and the WCG Client Services

- Check with the Sponsor/CRO to see if the study has been reviewed by the WCG IRB
  - If they are using another commercial IRB, the answer is likely "no".
  - Sometimes another site may have an approval with WCG IRB – ask the sponsor this too.
- Contact the WCG IRB Client Services for official determination about whether the study has been reviewed by the WCG IRB
  - If yes, request access to approved docs in Connexus. You will need these documents to conduct the study.
  - If no, get documents from Sponsor to make a submission.

Why is this Important?

- If the study has been reviewed by WCG IRB, we are just submitting to add CHLA as a study site
- If the study has not been reviewed by WCG IRB, we are submitting the study for initial review **AND** adding CHLA as a site

Communication with Sponsor – Who Will Submit?

Sponsor will Submit

- Make sure they submit the following for adding CHLA as a study site:
  - CHLA clearance notice
  - CHLA-WCG IRB consent checklist
- Inform them you (CHLA) need to review the draft consent forms before they go for WCG IRB review

CHLA will Submit

- If the sponsor will not make the submission, you will need to do this.
- Some study coordinators prefer this option to have better control over the submission process
  - Ensure clearance notice and consent checklist are submitted
  - Control over review of draft consent forms

Communication with Sponsor – Review of Draft Consents

- Talk with the Sponsor about reviewing draft consent forms
  - Who will review consents first - Sponsor or CHLA coordinator?
  - Explain CHLA Director approval will be necessary for any changes to CHLA required language

- A WCG staff member will send you an email with the draft consents attached.

Communication with Sponsor – WCG IRB Review Fees

- Does the Sponsor want to be billed directly for review fees?
  - If yes, include invoicing details in the WCG IRB submission form.
- Does the Sponsor want to reimburse CHLA for review fees?
  - If yes, ensure WCG IRB review fees are included in the CT budget
  - If yes, include CHLA billing information in WCG submission form.

CHLA Billing Information

Tigran Garoian
Children's Hospital Los Angeles
4650 Sunset Boulevard, Mail Stop #97
Los Angeles, CA 90027
Attn: Contracts and Clinical Research Team
chlaclinicalresearch@chla.usc.edu

Communication with Sponsor – Translations

- WCG IRB requires translations of consent forms
- Short forms may only be used when:
  - A full-length version of the consent form in a language understandable to the participant is not available, and
  - It is in the participant's best medical interest to be enrolled in the research before a translated consent form can be obtained.
- When a short form is used you are required to obtain a fully translated version of the currently approved consent form at the earliest opportunity and re-consent the participant.

Who will Perform Certified Translations?

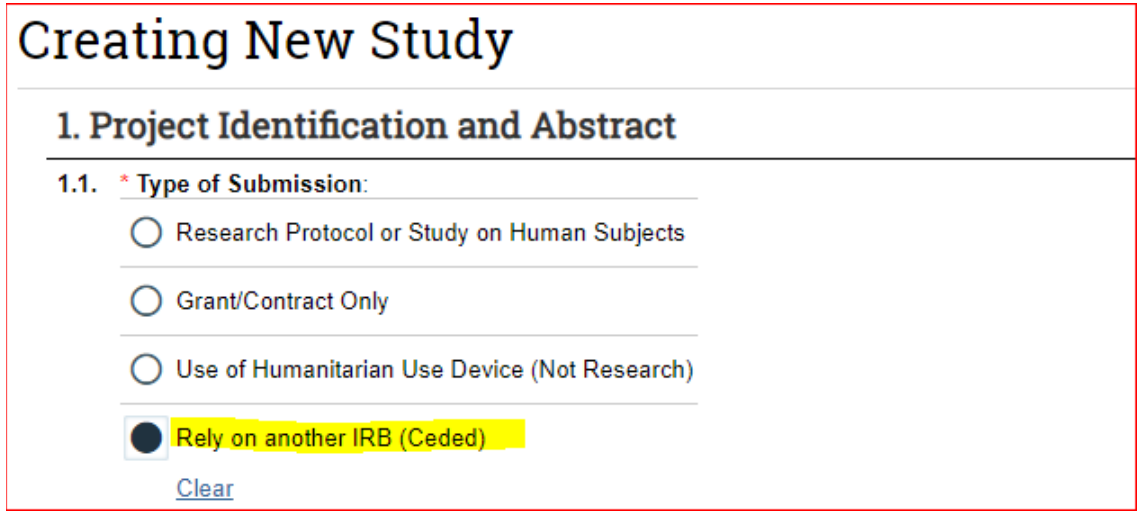
- Will the Sponsor use a 3rd party?
- Will WCG translation services be used?
- Will you use CHLA translation services?

Costs of translation services must be included in the clinical trial study budget if:

- CHLA translation services will be used
- WCG translation services is used

Submit for CHLA Clearance

Submit a Ceded Review Application in iStar



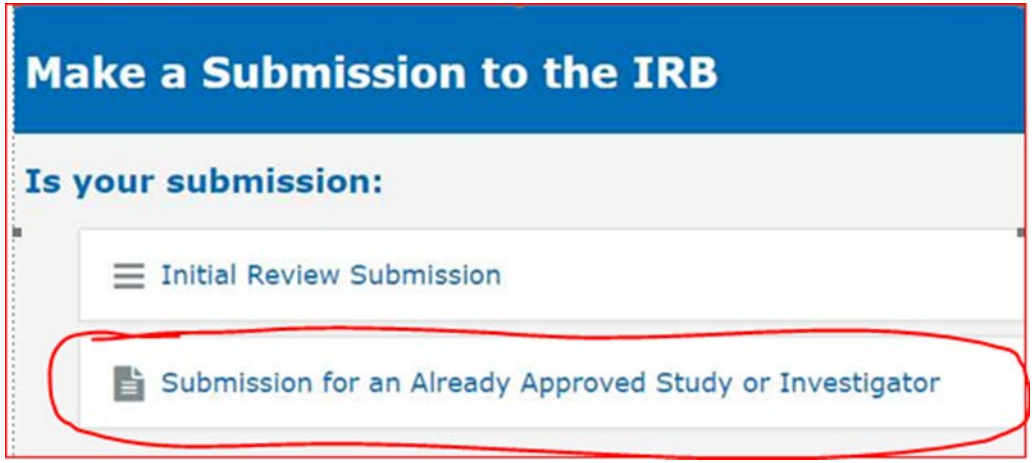
- Required for all studies that will be reviewed by the WCG IRB, no matter who makes the submission to WCG IRB
- The CHLA clearance process is not an IRB review.
- It is an administrative review to assure all required CHLA reviews are completed and the CHLA-WCG Consent Form Checklist is completed.

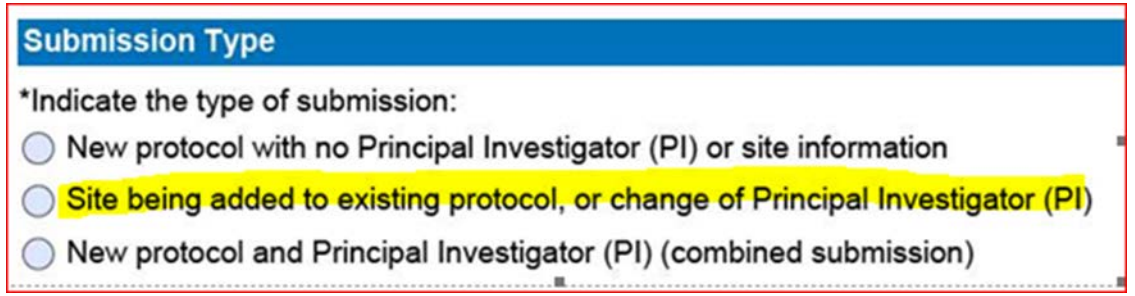
Submit to WCG IRB for Review

- If WCG IRB is the central IRB
  - You are just adding CHLA as a site to a protocol already approved by WCG IRB
  - Very easy process
    - Submit application in Connexus
    - Upload attachments as directed in the Connexus submission form
    - Upload cleared CHLA-WCG consent form checklist
    - Upload CHLA assent form for children ages 7 to 13 (if used)
    - Upload CHLA Addendum Consent for Subjects Turning 18 (if used)
    - Any CHLA specific recruitment or subject materials
    - PI medical license (for PIs who have not previously submitted to WCG IRB)
    - PI CV (for PIs who have not previously submitted to WCG IRB)

WCG IRB is the Central IRB

- This means WCG has already approved the protocol
- CHLA is being added as a performance site
- Review time is 1 to 5 working days
  - Note: Review does not occur until draft consents are approved by you and the sponsor



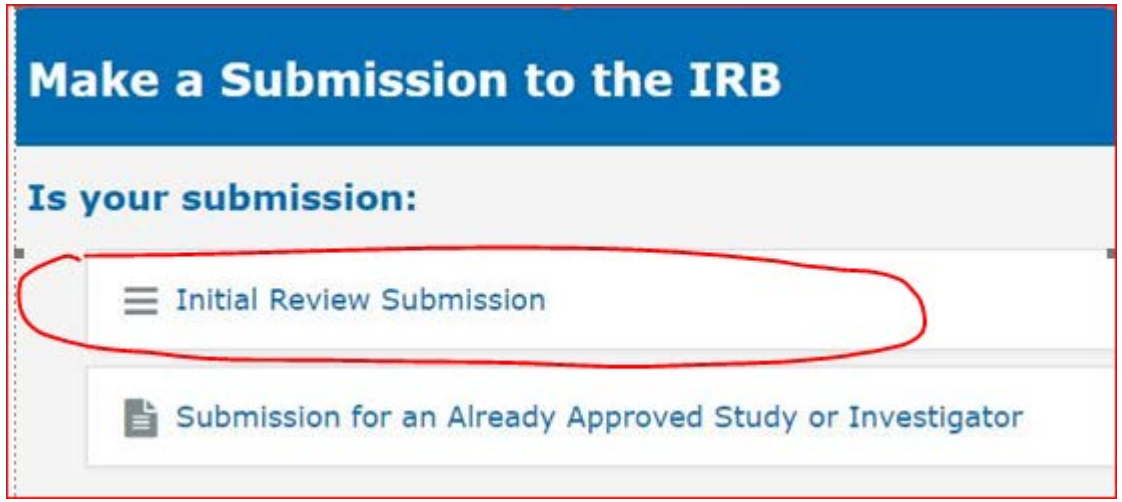


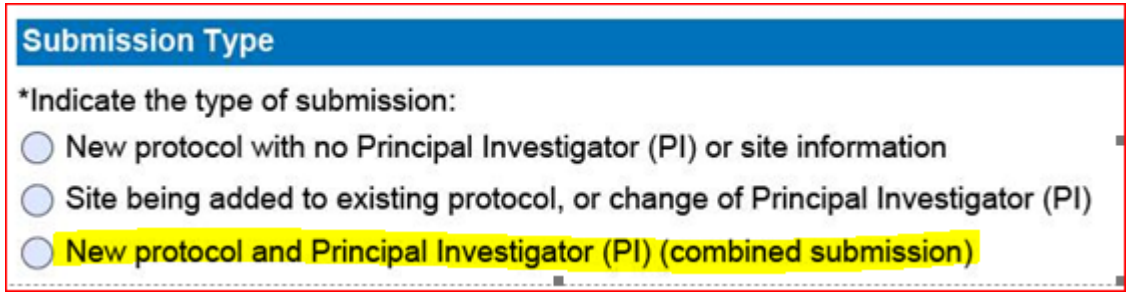
Submit to WCG IRB for Review

- If WCG IRB is NOT the central IRB
  - You are submitting a new protocol and adding CHLA as a site to be approved by WCG IRB
  - More involved process
    - Submit application in Connexus
    - Upload attachments as directed in the Connexus submission form
    - Upload cleared CHLA-WCG consent form checklist
    - Upload CHLA assent form for children ages 7 to 13 (if used)
    - Upload CHLA Addendum Consent for Subjects Turning 18 (if used)
    - Any CHLA specific recruitment or subject materials
    - PI medical license (for PIs who have not previously submitted to WCG IRB)
    - PI CV (for PIs who have not previously submitted to WCG IRB)
    - CHLA HSPP Notice of Ceded Review Clearance Letter
    - **Protocol and protocol support documents (provided by the Sponsor/CRO)**
    - **Investigator brochure (provided by the Sponsor/CRO)**
    - **Any additional protocol documents (provided by the Sponsor/CRO)**

WCG IRB is NOT the Central IRB

- This means WCG has not approved the protocol
- A protocol is being submitted for IRB review
- CHLA also is being added as a performance site
- Review time is 1 to 10 working days
  - Note: Review does not occur until draft consents are approved by you and the sponsor





Things to Do After Submission

- This step is crucial for a successful and timely submission!!

- WCG will not review the submission until these steps are taken:
  - Data Entry Team: Look for emails letting you know if the submission is incomplete
  - Pre-Panel team: You will always receive an email to review the draft consent forms
    - CHLA study team member **and** Sponsor/CRO must approve the consent forms or make revisions
    - Any changes to required CHLA language requires CHLA HSPP Director approval (sign-off) – these are the items on the CHLA-WCG IRB checklist

Email From WCG IRB Staff Member

CHLA Coordinator: Person Who Makes the Submission

Sponsor Contact: Person Listed for the Sponsor

CHLA PI: PI listed on the submission

From: WCG Client Services
To: CHLA Coodinator
Cc: IRB Reliance; Sponsor Contact; CHLA PI; Other CHLA contacts listed in the submission
Subject: Follow Up On Hold : Novartis XXHHTTIH / CHLA-20-00800 / PI Name - Site Response Needed - Cons
Forms for Pre-Review (EXTERNAL EMAIL)
Date: Thursday, November 5, 2020 10:06:45 AM
Attachments: ATT00001.bin
Consent Form Addendum - Returning Adults [
Consent Form
Importance: High

You will receive an email from a WCG staff member when the draft consent forms for CHLA have been created. They will be marked up with tracked changes to include CHLA required language. You will also receive a follow-up emails from WCG Client Services (like this one) when you don't respond to the first email.

Content of the Email from WCG Client Services

Make sure both you and the sponsor agree on the draft consents attached to the email.

Any changes to the CHLA required language (coded with a superscripted [24]) requires approval from the HSPP Director.

We have not received a response to the email below. As soon as we receive a response the submission can be taken off hold.

Sponsor: Novartis Pharmaceuticals Corporation
Sponsor Pr #: XXHHTTIH
IRB Pr #: 2020XXXX
IRB Study #: 123456
Work Order #: 1-1234567-1
Investigator: CHLA PI
Inst. #: CHLA-20-00800

Good Evening CHLA Coordinator:

As requested, attached are the redlined consent forms for pre-review prior to being seen by Board. Please note that any language coded with a superscripted 24 is Institution language and cannot be altered without sign-off from the institution. If this language is changed, the submission will remain on hold until sign-off is received. Please work together concerning changes to any of this language.

Email Content…Continued

Any content changes made by you or the sponsor that are NOT coded with "24" do not need HSPP Director approval. Just send them back to WCG Client Services.

If you need to make changes to the consent form redlines, please indicate them clearly, and please do not add or remove any language without tracking the change.

These are not approved consent forms; therefore, they may not be used to consent subjects.

Once your pre-review sign-off has been received, the submission will be moved forward for review, unless there are outstanding questions.

Reminders will be sent until all information/clarification is received. Please note WIRB does not hold submissions past 30 days without a response. If it is expected that the requested information will not be available within 30 days of this request, please consider temporarily closing your submission until the information becomes available.

If you have any questions, please let me know.

Examples of Tracked Changes in a Consent

Over the course of the 1-year study you will have up to 12 tablespoons (168 mL) of blood drawn. The blood collections will vary at each visit but at most will be approximately 1½ tablespoons (21 mL) on a single day.

Make sure you tell the study team about any medications you are taking during the study. This includes prescription drugs, over-the-counter medicines, natural or herbal medicines,

Delayed neurological events (onset [21]>greater than 8 weeks after infusion)

In addition, it is advised that [22]~~you~~ your female partner use a highly effective form o control method (contraception) if she is sexually active and may become pregnant.

infections. [24]If your HIV/Sexually Transmitted Infection (STI) test is positive and you are at least 12 years of age, we will not share the results with your parent(s) unless you tell us we can. If your HIV/Sexually Transmitted Infection (STI) test is positive and you are under the age of 12, the results will be shared with your parent(s).

Blood tests to determine your serum immunoglobulin levels

[24]If you think you have been hurt by taking part in this study, tell the doctor in charge of this research study as soon as possible. The research doctor's name and phone number are listed on the top page of this consent form. CHLA will offer you the care needed to treat injuries directly resulting from taking part in this research. Novartis will pay your costs for reasonable and necessary care if you have been injured because of taking part in this research study. If you receive Medicare/Medicaid and Novartis pays for medical treatment for injury relating to your participation in this research, Novartis will need to collect certain personal information about you, such as your name, date of birth, gender, social security number or Medicare/Medicaid identification number and information related to this research study. By signing this informed consent form, you are giving permission to Novartis to collect your personal and treatment related information and report it to the Centers for Medicare & Medicaid Services (CMS), while participating in the study and for as long as Novartis is required by the government to report this information. The sponsor will not use this information for any other purpose.

[24]CHLA and Novartis have no plans to pay you or give you other compensation for injury. You do not give up your right to pursue a claim through the legal system by signing this form. ~~If you are injured as a result of this study, please contact the study doctor immediately (investigator's name and contact information); he/she will arrange treatment.~~

~~Novartis will cover the reasonable costs of treatment for research related injuries beyond what is reimbursed by your health insurance under the following conditions and in accordance with local laws:~~

Common Areas Sponsors Change

- These sections have CHLA required language that will need CHLA Director approval if they are changed
  - Key Information Summary
  - Costs
  - Compensation for Injury
  - Confidentiality – no elements of HIPAA
  - Confidentiality – CHLA authorized access to records; separate HIPAA research authorization
  - Future use of data and samples – no elements of HIPAA
- Reminder: only changes to CHLA required language (coded as “24”) need CHLA Director approval

Submit an Amendment to CHLA

Submit an Amendment to Ceded Review Application in iStar

Once you receive WCG IRB approval:

- File an amendment to the ceded review application in iStar to upload the following documents:
  - The WCG IRB Certificate of Action (approval letter)
  - The WCG IRB approved CHLA consent and assent forms
  - Any CHLA specific recruitment or subject materials

- The amendment is not reviewed by the CHLA IRB.

- It is an administrative review to assure:
  - Consent forms include all CHLA-WCG Consent Form Checklist (unless exceptions are approved by the HSPP Director)

  - To upload the approved documents in iStar so they appear in OnCore for use by the CHLA study team.

Manage Your Submission with WCG IRB

Remember that you are relying on WCG IRB for review and oversight!

- You are responsible for:
  - Keeping all the WCG IRB approved protocol documents and information in the research regulatory binder for the study.
  - Assuring all amendments, continuing reviews, and reportable events are reviewed by the WCG IRB (submit via Connexus).
  - Understanding WCG IRB requirements for research approved by the WCG IRB. See Guide for Researchers on this website: https://www.wcgirb.com/how-to-submit/irb-forms/.
  - Submitting amendments to the CHLA ceded review application in iStar to ensure the most recent approved documents appear in iStar and OnCore.

- If your study contacts change, be sure to revise them in Connexus, so that the right people receive WCG IRB correspondence about the study.

Changes in the New Year (2021)

- CHLA will allow IRB review by the central IRB chosen by the sponsor for industry clinical trials
  - WCG IRB
  - Advarra IRB
  - Other IRBs: reliance agreements and required CHLA consent language will be need to put in place

- Benefits:
  - Submitting to central IRB will be to add CHLA as a site
  - No more submissions of the protocol for review (the protocol will already be reviewed)

- Stay tuned for more details in the new year ☺

Questions and Discussion