DF/HCC Policy Updates Related to the Form FDA 1572 Requirement
Guidance and Frequently Asked Questions

Effective January 31, 2020, the Dana-Farber / Harvard Cancer Center (DF/HCC) Site Management Plan, along with many of the DF/HCC Polices and Operations were revised to update the requirements for protocol-specific Form FDA 1572s across DF/HCC institutions. This document explains the rationale and regulatory background for these policy changes, and answers frequently asked questions. For a comprehensive review of the updated policies and documents, please visit the DF/HCC Policy Updates page.

An overview of the change:

For each new DF/HCC protocol submitted on or after January 31, 2020, there must be a separate Form FDA 1572 signed by a Principal Investigator (PI) at each participating DF/HCC institution. Each PI is responsible for designating qualified subinvestigators at their site, who will be listed on the Form FDA 1572. Each PI is responsible for the oversight and conduct of research at their DF/HCC institution.

Prior to this update, the DF/HCC Site Management Plan outlined a system using and Overall PI and Site Responsible Investigators for the conduct of trials. The Overall PI signed one Form FDA 1572 that covered all participating DF/HCC institutions, listing Site Responsible Investigators as subinvestigator. The Overall PI was ultimately responsible for the oversight and conduct of research at all participating DF/HCC institutions.

What is the rationale behind this change?

DF/HCC leadership has determined that this change is necessary for DF/HCC to further align our consortium with federal and state regulations and continue to work successfully with strategic research partners.

What do I need to do as a DF/HCC researcher to ensure compliance with these updated policies?

DF/HCC leadership has determined that formal documentation of training is required for all research personnel for the following revised policies:

- RCO-102: Responsibilities of Investigators
- RCO-203: Regulatory Documentation
- RCO-204: Safety and Event Reporting
- CON-101: Obtaining Consent from Non-English Speakers

To assist with the review and training of these updates, tracked changes as well as clean versions of all updated policies and document is posted on the Policy Updates Page. Additionally, ODQ will provide a brief eLearning for all research personnel.

ODQ has provided a Policy Training and Documentation Record which may be used to formally document training of these updates. All documentation of training should be maintain according to DF/HCC Policy EDU-100: Training Requirements for Research Personnel.

How does this affect investigator responsibilities?

DF/HCC Policy RCO-102: Responsibilities of Investigators has been revised to align with this change. Please carefully review this policy for a comprehensive understanding of investigator responsibilities. A few key changes to be aware of are:

- The definitions and use of the terms "Overall PI" and "Site Responsible PI" have been removed throughout this and other policies. The terms "Principal Investigator (PI)" and "Subinvestigator" are now used to define the PI conducting and providing full oversight of research at their site, and all subinvestigators designated by that PI at their site, who are also listed on their 1572.

- Each PI is now responsible for certain tasks that were previously coordinated through and under the responsibility of the Overall PI and lead site. This includes, but is not limited to:
  - signing and maintaining an up to date, protocol-specific 1572;
  - designating qualified subinvestigators at their institution;
  - delegating research tasks to qualified persons and maintaining a protocol-specific Delegation of Authority (DOA) log for their site as applicable;
  - Identification, review, assessment and documentation of adverse events, protocol violations, deviations and unanticipated problems specific to the site.
    - When an event impacts the protocol or informed consent form, and requires changes to either document, the PI at the Core Site must be notified to facilitate the submission of the appropriate amendment (see below)
  - Review of IND/IDE safety reports per RCO-204: Safety and Event Reporting
    - For all DF/HCC investigator-sponsored trials, and externally-sponsored pilot, phase I and phase I/II studies, it is the responsibility of each PI to review all IND/IDE safety reports.
    - Each PI will assess whether IND/IDE safety reports need to be reported to the IRB. If it is determined by one or more PIs that it should be reported, they will consult with the PI at the Core Site to facilitate submission (see below).

- Each protocol will have a "Core Site" defined as "The designated DF/HCC site that coordinates regulatory submissions for DF/HCC". The purpose of the Core Site is *not* to provide oversight over the participating sites; rather, it is to coordinate shared regulatory submissions to the SRC/IRB and other reporting structures to avoid duplicate reporting. The additional responsibilities of the PI at the Core Site include:
  - Submissions to the IRB of the new protocol, amendments/changes to the protocol and consent forms, continuing reviews and administrative modifications
  - Keeping other participating DF/HCC sites informed on the status of these submissions

  - Setting enrollment goals and tracking overall enrollment at DF/HCC
  - Submission of IND/IDE safety reports to the IRB per IRB policy as applicable

- Reminder: A sponsor-investigator has additional responsibilities as outlined in RCO-100: Investigator-Sponsored Research. While minor updates have been made to this policy, this change does not significantly affect those responsibilities.

How does this affect regulatory documentation requirements?

DF/HCC Policy RCO-203: Regulatory Documentation as well as the DF/HCC Regulatory File: Required Document List have been updated to align with this change. Please carefully review these documents for a comprehensive understanding of the updated requirements. A few key changes to be aware of are:

- Each participating DF/HCC site will maintain an Investigator File. There are no longer a separate Lead Site vs. Non-Lead Site File.
- When a DF/HCC satellite is operating under the same 1572 as the main site, they may maintain a limited regulatory file as described in the Required Document List. When a satellite or affiliate PI is operating under their own 1572, they will maintain a full Investigator File.

Please contact ODQEducation@dfci.harvard.edu with questions regarding the changes outlined in this document.