Non-Therapeutic Research at DF/HCC

DF/HCC RESEARCH SUPPORT OFFICE HOURS

October 7, 2021

On the menu for today…

INTRODUCTION
DF/HCC REFRESHER AND NON-THERAPEUTIC RESOURCES AVAILABLE

RESEARCH SUPPORT WEBSITE DEMO
NON-THERAPEUTIC RESEARCH PORTAL

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OF NON-THERAPEUTIC PROJECTS

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CLINICALTRIALS.GOV & CTRP
WHAT TYPES OF STUDIES MUST REGISTER?

ACCRUAL IN ONCORE
SUBJECT-LEVEL VS. SUMMARY ACCRUAL

+ Panelist Q&A
Submit Questions via Zoom

Remind me…What is DF/HCC?

Dana-Farber/Harvard Cancer Center is…

An NCI-designated cancer center…

…comprised of these sites

- Beth Israel Deaconess Medical Center (BIDMC)
- Boston Children's Hospital (BCH)
- Brigham and Women's Hospital (BWH)
- Dana-Farber Cancer Institute (DFCI)
- Massachusetts General Hospital (MGH)
- Harvard Medical School (HMS)
- Harvard School of Public Health (HSPH)

A protocol must by submitted to DF/HCC if it is….

Cancer relevant

AND/OR

NCI-funded, even if not directly cancer-related (e.g. a tobacco use study)

Protocol is hypothesis-driven and statistically powered to answer a scientific question

Why do I need to submit my study to DF/HCC?

The NCI mandates that:

1. All such research undergo a separate scientific review at DF/HCC

2. We track and report these projects to the NCI through a central DF/HCC mechanism

Additionally…

Each institution that benefits from DF/HCC support and infrastructure has entered into an agreement to report all cancer-relevant research to DF/HCC as a consortium member.

Non-Therapeutic Studies

A non-therapeutic study is unlikely to produce any direct medical benefit to the participants involved. **The aim of non-therapeutic research is to obtain knowledge which may contribute towards the future development of new forms of treatment or procedure.**

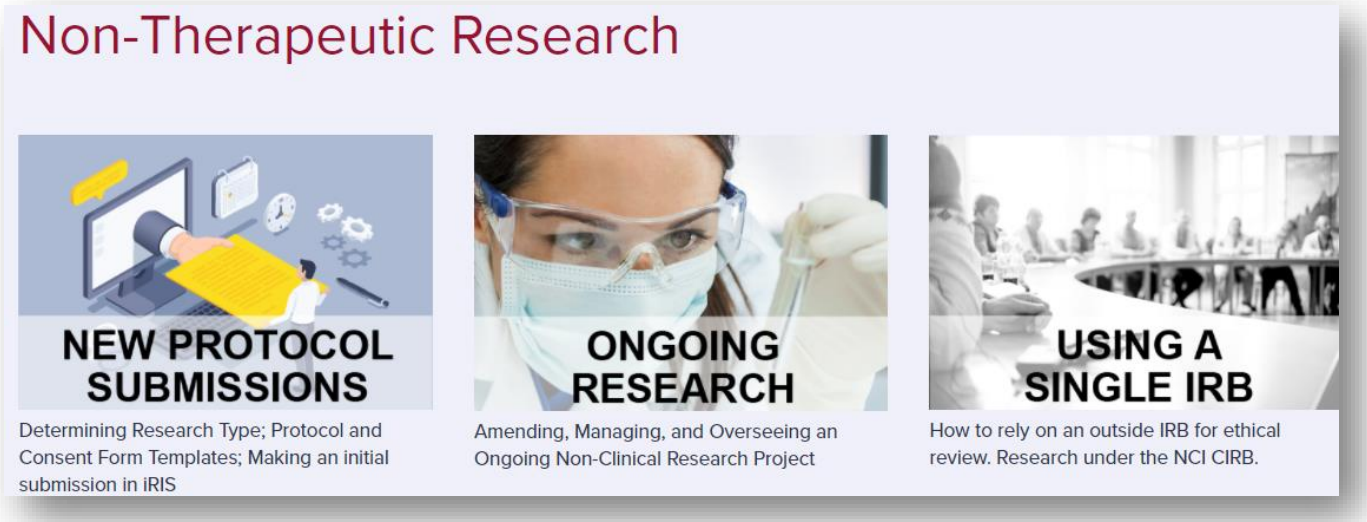
- Non-Therapeutic studies may include clinical and non-clinical research
- May involve human subjects or not
- They may not involve the administration of any intervention (drug or otherwise) aimed at treating or curing a particular condition

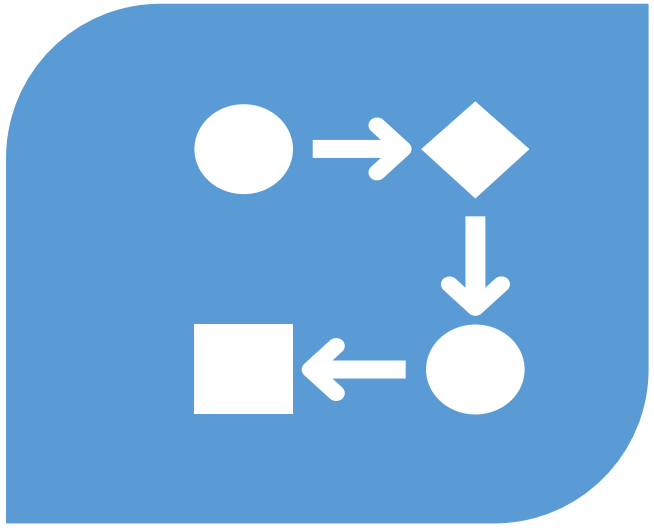
Support and Resources for Non-Therapeutic Research at DF/HCC

Launched in May 2021:

DF/HCC Research Support Website – Non-Therapeutic Portal

- Offers guidance and step by step instructions for submitting and managing non-therapeutic projects
- Quick links to various systems and commonly used resources
- Continuing to look for ways to build up our resource base for non-therapeutic research

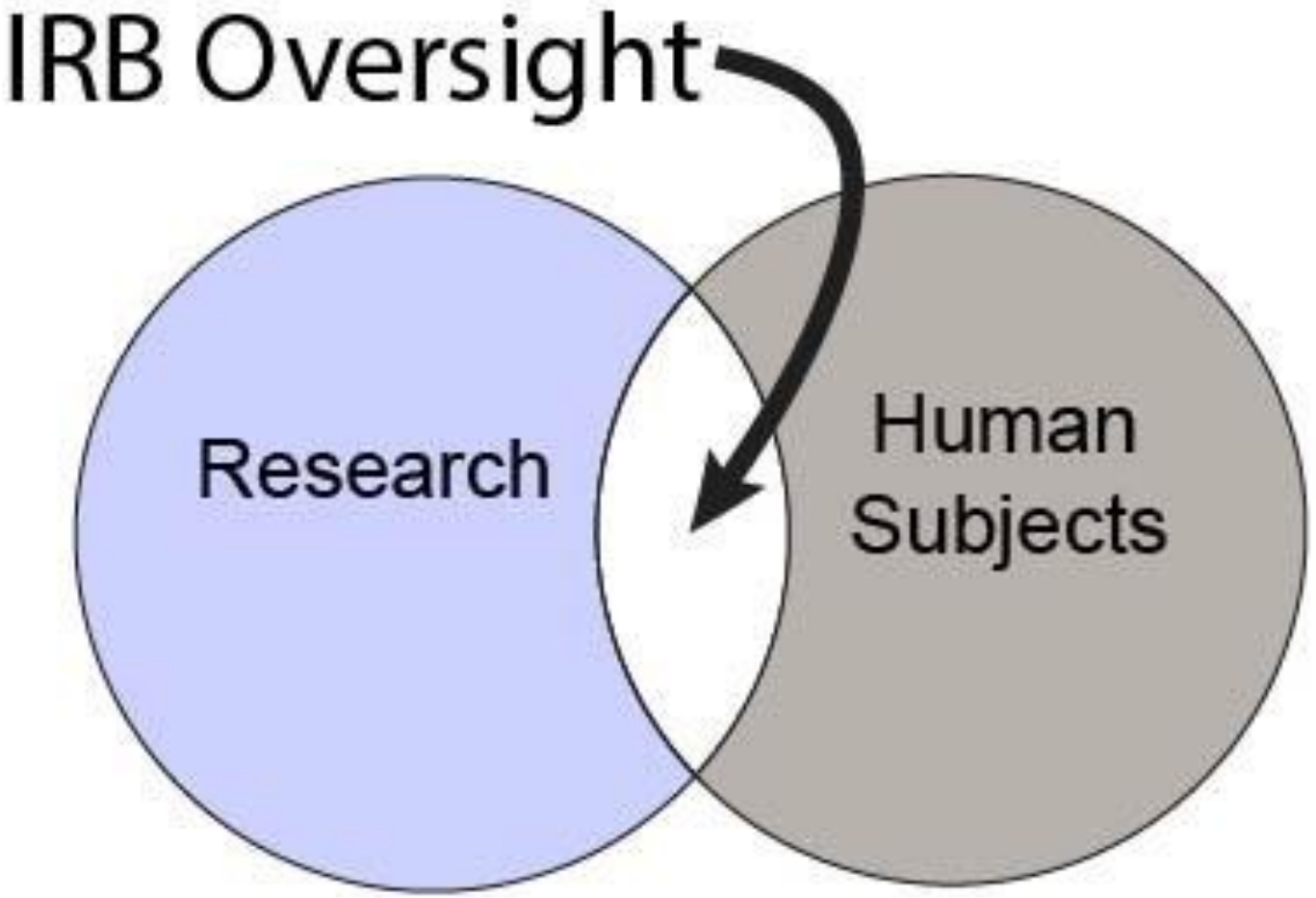




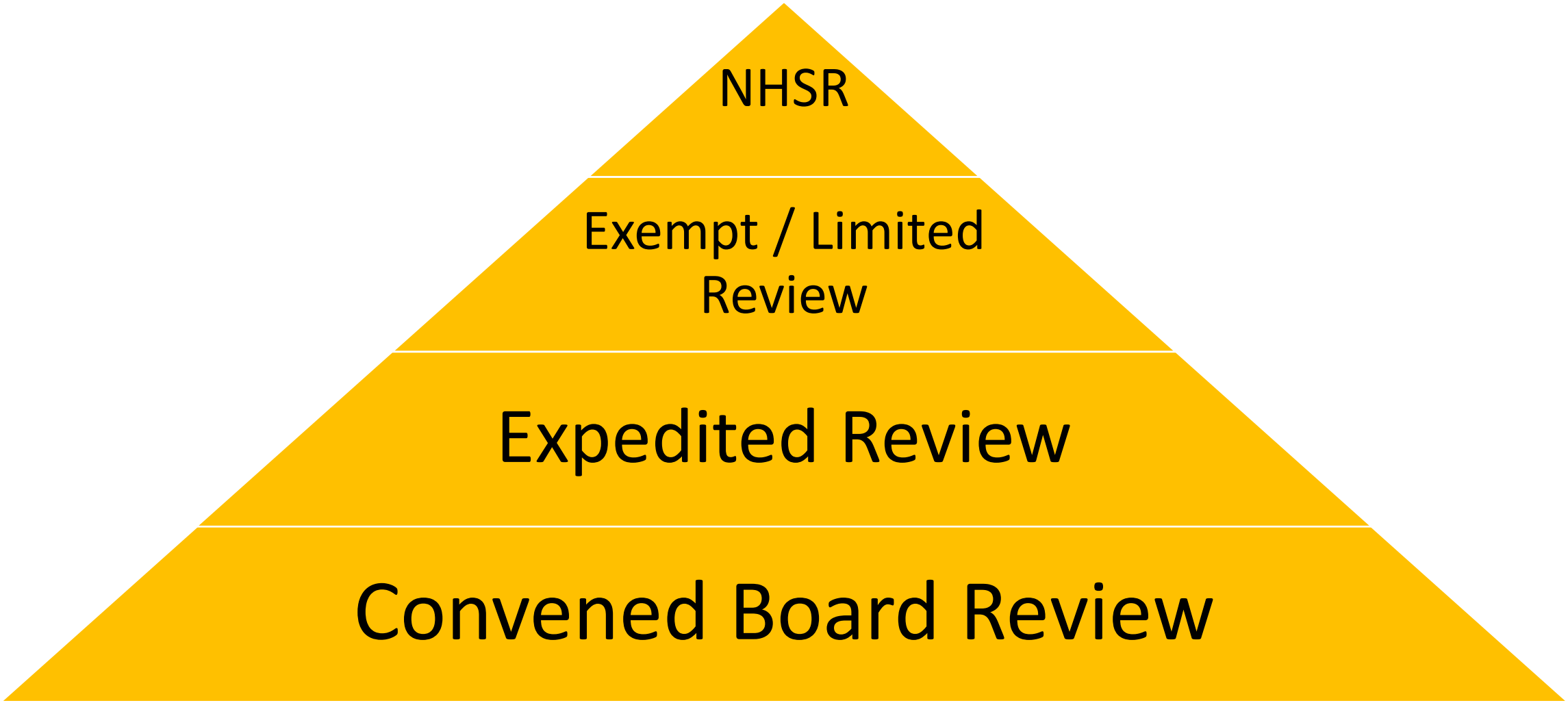
SUBMISSIONS, DETERMINATIONS AND REVIEW

OF NON-THERAPEUTIC PROJECTS

Submissions to iRIS



Types of IRB Review



Types of Studies: NHSR and Exempt

Not Human Subjects Research (NHSR)

- Not Research:
  - Quality Improvement
- Not Human Subjects:
  - Case study of 3 or fewer patients
  - Receiving de-identified data or specimens where no link exists with identifiers

Examples of Exempt Studies

- Surveys/interviews/focus groups ***with adults*** collecting non-sensitive data
  - Interview with clinicians regarding work-life balance
- Benign behavioral interventions ***with adults***
  - Patients interact with app, then provide feedback on development for purpose of research development
- Secondary research with existing data or samples
  - Limited datasets from data banks or research studies
  - Chart reviews

Types of Studies: Expedited and Full

Expedited Review

- 9 Expedited Categories
  - Secondary use of identifiable data collected under a separate clinical trial
  - Acceptability of exercise regimen
  - Audiotape focus group of patients and their palliative care needs

Full Review

- Greater than minimal risk research
- Minimal risk that does not fit in exempt or expedited categories
- Clinical Validation of a DNA Test for Breast Cancer Screening

Application Types

NHSR or Secondary Use

- No protocol necessary
- IRB will review and determine NHSR, exempt, expedited, or full
- Dependent on the identifiability of data and future use

SBER

- Non-therapeutic, non-interventional studies – no hypothesis testing
- SBER protocol included to describe method
- No SRC review

NPA

- Non-Therapeutic, Interventional, Observational, Ancillary, Correlative
- Protocol included to propose hypothesis, describe methods and analysis plan
- SRC review required

SRC and IRB Review Criteria

SRC

- Assessment of scientific merit: innovation and importance
- Scientific rationale and the needs of the target population
- Feasibility of the research plan including statistics-based accrual requests
- Nursing and pharmacy requirements, as necessary
- Priority of the protocol in comparison to pre-existing research

IRB

- Risks to subjects are minimized
- Risks are reasonable in relation to benefits
- Equitable subject selection
- Adequate provisions to protect privacy and confidentiality
- Additional safeguards to protect vulnerable subjects
- Consent will be sought from each participant
- Consent will be documented in accordance with regulations

CATEGORIES OF RESEARCH

HOW NON-THERAPEUTIC RESEARCH IS CATEGORIZED AT DF/HCC

How non-therapeutic research is categorized at DF/HCC

Accruals to certain categories of cancer-related human subjects research are reportable to NCI as part of the Cancer Center Support Grant (CCSG; 5P30CA006516-56):

- **Interventional**: Diagnostic, Screening, Prevention, Supportive Care, Health Services Research
- **Non-interventional Observational**: Epidemiological, Quality-of-Life, Outcomes, (Screening), (Health Services Research)
- **Non-interventional Correlative Research**: Basic Science (patient-linked samples)
- **Non-interventional Ancillary Research**: Studies stimulated by a main clinical study, including participants enrolled in that study

How non-therapeutic research is categorized at DF/HCC

Accruals to certain categories of cancer-related human subjects research are reportable to NCI as part of the Cancer Center Support Grant (CCSG; 5P30CA006516-56):

- Reportable studies are hy**pothesis-driven, measure biomedical/health outcomes and statistically powered to answer a research question**.
- Reportable studies u**ndergo central review by the the Scientific Review Committee (SRC)**, as required by the NCI for CCSG-supported cancer centers.
- This reporting requirement **applies to all cancer research conducted at DF/HCC consortium institutions** (BCH, BIDMC, BWH, DFCI, HMS, HSPH, MGH)

Project submissions to iRIS: Pick the correct application

New Protocol Application (NPA)

Submit when: Human subject research where the DF/HCC site is engaged in the research, and research is assessing biomedical and/or health outcomes. This application form is used for the following non-therapeutic research types:

- Specimen and/or Data Banking
- Observational
- Ancillary
- Correlative
- Interventional

- ❖ Hypothesis driven
- ❖ Study powered to test hypothesis
- ❖ SRC review and Oncore registration required

Reportable on CCSG

NPA classification drives iRIS review routing

New Protocol Application (NPA): Section 5.0 Classification

5.1 Cancer/Non-Cancer

Please select one:

- (•) The study involves cancer patients, the study objectives are cancer-related, or it is cancer-focused.
- ( ) This is a non-cancer therapeutic study.
- ( ) This is a non-cancer non-therapeutic study.

Section 5.2 Classification: Interventional, Observational, Ancillary, Correlative, etc.
If outside sponsor, our classification must match (ClinicalTrials.gov)

5.3 Intervention Type

Is this a **treatment** trial (i.e., the protocol is designed to evaluate one or more interventions for treating a disease, syndrome, or condition).

( ) Yes (•) No

Project submissions to iRIS: Pick the correct application

Non-Interventional Social, Behavioral, and Education Research (SBER) Application

Submit when: Human subject research that may include experimental manipulation, however, biomedical and/or health outcomes are not assessed in SBER studies. These research projects seek to improve our understanding of human behavior, attitudes, beliefs, interactions, social and economic systems, organizations, and institutions. Common methodologies may include focus groups, interviews, survey procedures, or observation of public behavior.

- No hypothesis; may include only information gathering
- Only descriptive statistics (if any)
- Neither SRC review nor Oncore registration is required

Not reportable on CCSG

Examples: SBER vs. Observational

SBER:

The goal of this study is to identify the key challenges faced by patients, caregivers, and clinicians….explore perceptions…. use qualitative methods to identify the challenges faced by patients through interviews, focus groups, etc.

Observational:

Characterize changes in health-related quality of life, as assessed by a validated instrument, between two time points in cancer patients with and without standard-of-care supportive intervention. Includes power analysis to detect differences between two groups, etc.

Initial Review of Submission: CCSG Confirmation

Upon submission, protocol is reviewed to determine CCSG categorization:

1. Is the study cancer-relevant?

2. Determine CCSG report type: Interventional, Non-Interventional, N/A

3. Was the correct study application used?

4. If NPA used, is classification correct?

5. The only ways to correct submission errors is to withdraw, correct errors and resubmit as new because application type and classification affects study routing for review.

CLINICALTRIALS.GOV & CTRP

WHAT TYPES OF STUDIES MUST REGISTER?

ClinicalTrials.gov

- **What is Clinicaltrials.gov:**
  - Clinicaltrials.gov is a registry and results database of publicly and privately supported clinical studies of human participants conducted around the world.
    - Federal law (FDAAA 801), (Final Rule) and (NIH Policy) requires registration and results reporting for applicable clinical trials.
    - DFHCC Registers PI Sponsored Interventional Trials Regardless of Phase to meet Federal and Publication Requirements
- **Registration and reporting requirements for Non-Interventional Trials in Clinicaltrials.gov?**
  - Presently, Non-interventional trials are not considered applicable trials per FDAAA-801, FINAL Rule and NIH Policy.
  - Some funding sponsors (PCORI) do require registration/results reporting for Non-Interventional Trials
  - ODQ will register DFHCC PI Sponsored Non-interventional trial upon request
    - Clinicaltrials.gov language must be added to consent documentation
- **How does ODQ support these activities**?
  - ODQ will create initial registrations/reset Clinicaltrials.gov Accounts, create compliance reports for Leadership and send notification/reminders to Investigators.

Key Reminders for ClinicalTrials.gov

- Non treatment trials that can be categorized as interventional include Supportive Care, Screening, Health Services Research, and Basic Science.
- Changing a trial mid study from Non-Interventional to Interventional.
  - Interventional trials have reporting requirements to Clinicaltrials.gov and the Medical Journals. Switching a trial to interventional from observational midway could prove issue with these requirements.
  - Suggestion: Register on Clinicaltrials.gov if there is a possibility of an interventional component to the trial or open another protocol for the intervention.
- ODQ will register Non-Interventional trials upon request. Responsible Party must maintain the Clinicaltrials.gov record per requirements.

NCI-Clinical Trials Reporting Program (CTRP)

- **What is NCI-Clinical Trials Reporting Program (CTRP)**
  - NCI CTRP is a comprehensive data base for cancer relevant clinical trials.
  - Dana Farber Harvard Cancer Center as NCI designated cancer center is required(P30 core grant) to register all cancer relevant Interventional and Observational clinical trials.
    - Office of Data Quality (ODQ) reports and maintains NCI-CTRP database for all of DF/HCC, including registrations, amendments and accrual reporting for all required trials.

- **Which type of Non-Interventional Trials need to register subjects in OnCore for NCI-CTRP reporting?**
  - All Observational trials (Open on 01/01/2018 and after)

ACCRUAL IN ONCORE

SUBJECT-LEVEL VS. SUMMARY ACCRUAL

Subject level vs Summary Accrual in OnCore

DF/HCC reports subject-level information to NCI for all interventional trials. Therefore, **subjects must be registered individually in OnCore for interventional studies**.

For **non-interventional studies**, summary accrual reporting may be an option. **Summary accrual** allows for reporting of groups of subjects at a time so long as they share characteristics (enrolling institution, demographics).

- Summary accrual is most useful when recruiting a large number of subjects, subjects that are not patients at DF/HCC member institutions, or subjects where complete demographic information is not collected as part of the research.
- ODQ must approve requests to use summary accrual.