Quality Assurance and Safety Monitoring Committee (QASMC)

Policies and Procedures

March 31, 2015
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1.0 The Quality Assurance and Safety Monitoring Committee (QASMC)

To maintain National Cancer Institute (NCI) designation, the Alvin J. Siteman Cancer Center (SCC) must ensure that research data generated under its sponsorship are of high quality, reliable, verifiable, and reproducible. Quality assurance auditing was implemented in November 1997 by the Quality Assurance Subcommittee (QAS) of the Protocol Review and Monitoring Committee (PRMC). Standards introduced in 2001 by the NCI for data and safety monitoring led to the formation of a Quality Assurance and Data Safety Monitoring Committee (QASMC) in September 2001 to replace the QAS.

Members of the QASMC are appointed by the Director of the SCC and are asked to serve for two years. Appointments may be renewed for additional terms. Members are selected based on the experience they have in designing or conducting clinical trials or special clinical expertise (pharmacology). See Appendix A for the current membership of the Siteman Cancer Center QASMC.

2.0 Goals and Responsibilities of the QASMC

In compliance with the NCI-approved Institutional Data and Safety Monitoring (DSM) Plan, implemented in August 2001, and most recently updated April 29, 2007, the QASMC is charged with overseeing the data and safety monitoring of institutional trials, reviewing all serious adverse events (SAEs) that occur on research studies conducted under the auspices of the Siteman Cancer Center (SCC), and reviewing quality assurance (QA) audits on institutional therapeutic trials, as well as any other trial at the request of the PRMC. Additional audits may be conducted at the request of the PI, if resources are available.

2.1 Specific Responsibilities of the QASMC

- Review in detail all SAEs occurring on trials at SCC, including institutional, cooperative group, multi-institutional and pharmaceutical studies.
- Review DSM reports submitted at least twice yearly by principal investigators (PIs) or trial-specific DSM committees.
- Provide individual members to serve as QA Advisors, in order to provide expertise for QA audits on institutional trials.
- As a Committee, review the trial audit findings of the QA Specialist and QA Advisor, and make recommendations based on the findings to improve study compliance.

Documentation of SAE reports, DSM reports and QA audits is maintained in separate files from the PRMC documentation. PRMC files are marked to indicate the existence of a QASMC file. Tracking forms are completed to indicate the status of reports and, when final, the tracking forms are put on record in the PRMC file. The approved QASMC meeting minutes are submitted to the PRMC monthly meeting.

3.0 QASMC Meetings

The QASMC meets monthly (usually the second Tuesday) to review Unanticipated Problem reports, semi-annual DSM reports and QA audit reports. In the event that the chair is unavailable for a regularly scheduled meeting, an alternative date, that is mutually agreeable to the Committee members, during
the same calendar month, is selected.

4.0 QASMC Policies and Procedures: Unanticipated Problems (UPs) – Adverse Events (AEs)

4.1 UP (AEs) Reporting Requirements

Unanticipated Problem (UP) adverse event reports are submitted to the Washington University Human Research Protections Office Committee (HRPO) [the institutional review board]. QASMC receives Unanticipated Problem reports on cancer-related protocols electronically from the protocol-specific research team(s) at the time of submission of the event to the IRB. The definitions of reportable events are provided in the HRPO policies and procedures.

4.2 UP adverse event reports should contain, at a minimum, the following information:

- NCI Common Toxicity Criteria (CTC) description of the event
- NCI CTC grade of the event
- Start date of the UP
- Stop date of the UP
- Outcome
- Relevant laboratory and diagnostic test results, including dates
- Start date of protocol intervention and/or therapy, including cycle information (if applicable)
- Last date of protocol intervention and/or therapy (immediately prior to UP)
- Relationship of event to investigational drugs or intervention (approved by the Principal Investigator)

The reportable adverse event case report forms specified in the protocol should be utilized for QASMC reporting. The case report forms provided by the sponsor should be sent electronically to the QASMC e-mail inbox for review (for example, in the case of a pharmaceutical company or cooperative group studies the MedWatch 3500 or ADEERs reports may be utilized). For other protocols, a generic UP form (Appendix B) is available on the SCC web site (http://www.siteman.wustl.edu/prmc.aspx), which may be modified for use with specific studies as necessary. It is critical that the reportable adverse event form be reviewed, signed, and dated by the Washington University PI prior to submission.

4.3 UP Report Submissions

Submit an electronic copy of the reportable event to QASMC at qasmcwudosis.wustl.edu. Please note: All reportable UPs should be submitted to the HRPO per their policies, procedures, and/or recommendations, as a separate submission.

4.4 UP Review Procedures

UP reports are assigned to physician members of the QASMC for review. In the event that an UP is reported to multiple studies in the same month (e.g., an adverse reaction to a chemotherapeutic agent employed in several different open studies), all reports of the event are assigned to one reviewer. UP paperwork is distributed to faculty reviewers prior to the meeting. The event is assessed for accuracy of the reporting and attribution. The event is compared to the cumulative summary report (from HRPO) to review for frequency and severity of events. The
reviewer will assess the progress of the study and the progress of the participants to determine if protocol modifications are necessary. This includes reviewing the consent form to ensure that, if appropriate, the risk of the event is adequately addressed. Reviewers decide whether to approve an event or to present it to the Committee for discussion.

After full-committee discussion, the Committee will make one of the following decisions:

1. **Approved** – No further action required.
2. **Approved with Comments** - Educational letter to be sent to the research team. Information is provided to improve future reporting but does not require a re-submission or revision at this time. (e.g. protocols that are in follow-up only and/or administrative issues).
3. **Correction Required** – Letter to be sent to the research team and copied to HRPO documenting the Committee’s decision that a revision to the event submission and/or the protocol/consent is to be made or that additional information is needed prior to approving the report. When a revision is requested, the research team should submit the revisions within 30 days.

5.0 **QASMC Policies and Procedures: Data and Safety Monitoring (DSM) Reports**

5.1 **DSM Reporting Requirements**

In compliance with the Institutional DSM Plan, the QASMC requires DSM reports to be submitted on institutional trials, as designated by PRMC (generally every six months. The HRPO requires submission of a DSM report annually at the time of renewal. The most recent report approved by the QASMC may be utilized for HRPO submission. A notification that the DSM report is due will be sent to the research team approximately 30 days before the report is due in the Protocol Office.

- DSM reports will be required **six months** after accrual has opened if; at least five patients have been enrolled.
- DSM reports will be required **one year** after accrual opens if fewer than five patients are on study within six months of accrual opening.
- The last DSM report will be due **six months after the last patient completes treatment.**

Given the importance of timely review, **accrual will be suspended** on those studies where the DSM report, including a report of a Data and Safety Monitoring Committee (DSMC) or any associated contingency or deferral response letters, if applicable, is overdue by more than 120 days. A reminder is sent approximately 30 days after the due date. If a DSM (or DSMC) report is not received in the Protocol Office within 90 days of its due date, a final reminder will be sent via email. If the report is not received within the next 30 days, a notice will be sent to the HRPO, PRMC and research team stating that accrual is suspended until further notice from the QASMC. HRPO will notify the OHRP and FDA (as applicable) in accordance with the requirement that all suspensions and closures be reported to these agencies. Once the DSM (or DSMC) report is received and approved by the QASMC, notice will be sent to resume the study.
5.2 DSM Documentation

5.2.1 Single Institution Studies

Reports should be prepared by the research team or DSM Committee (see Section 5.2.4 for more detail) and signed and dated by the PI or Chair of the Committee, as applicable. All relevant information should be provided but at a minimum, reports must include the following items:

- **DSM report** – see template [http://www.siteman.wustl.edu/internal.aspx?id=465](http://www.siteman.wustl.edu/internal.aspx?id=465) and required elements
- **Current consent form** unless revisions made per SAE, then submit revised consent
- **SAE cumulative summary** – available from the myIRB and Siteman database

5.2.2 Multi-site Institution Studies where WU is the coordinating center

Reports should include all relevant information, as detailed above, incorporating data from all study sites.

5.2.3 Multi-site Institution Studies where WU is not the coordinating center

The coordinating site must provide a study summary at a minimum of once per year. This report should include information regarding accrual, toxicity and response (where appropriate) from all participating sites.

5.2.4 Studies requiring a Data and Safety Monitoring Committee (DSMC)

DSMC Documentation should include: DSM report (as prepared by the research team), recommendation report from DSMC (prepared & signed by DSMC chair), current consent & SAE summary.

5.3 DSMC Membership:

A DSMC will consist of no fewer than 3 members including 2 clinical investigators and a biostatistician. Like investigators, DSMC members are subject to the Washington University Medical School policies regarding standards of conduct. Individuals invited to serve on the DSMC will disclose any potential conflicts of interest to the trial principal investigator and/or appropriate university officials, in accordance with institution policies. Potential conflicts that develop during a trial or a member’s tenure on a DSMC must also be disclosed.

5.4 DSMC Responsibilities:

- The DSMC must meet on a regular schedule (not less than twice a year) over the course of study (with additional meetings as needed) to:
- Review data (including blinded data) over the course of the trial relating to efficacy, recruitment, randomization, compliance, retention, protocol adherence, trials operating procedures, form completion, intervention effects, gender and minority inclusion and subject safety.
• Identify problems relating to safety over the course of the study. Inform study principal investigator via written report, who in turn will ensure that all clinical collaborative site principal investigators receive this report.
• Identify needs for additional data relevant to safety issues and request these data from the study investigators.
• Propose appropriate analyses and periodically review developing data on safety and endpoints.
• At each meeting, consider the rationale for continuation of the study, with respect to recruitment, progress of randomization, retention, protocol adherence and compliance, data management, safety issues, and outcome data, if relevant, and make a recommendation for or against continuation of the trial.
• Provide the principal investigator and QASM, and PRMC Chairs written reports following each DSMC meeting. The principal investigator will then forward the report to the IRB.
• Provide advice on issues regarding data discrepancies found by the data auditing system or other sources. If the QASM Chair requests this advice, it should be provided by the DSMC in writing within one month of the date of the request.
• If there is more than one clinical site, the study principal investigator is responsible for sending the reports to individual site principal investigators, who in turn are required to distribute the report to their local IRBs, as detailed in the NIH "Guidance on Reporting Adverse Events to Institutional Review Committees for NIH-Supported Multicenter Clinical Trials" (NIH Guide for Grants and Contracts, June 11, 1999).

5.5 DSMC Meetings

DSMC meeting coordination is the responsibility of the research team. Data must be provided to the DSMC members by the research team prior to the meeting. DSMC meetings will be divided into an open and closed session. First is an open session during which members of the clinical trial team may be present, at the request of the DSMC, to review the conduct of the trial and to answer questions from members of the DSMC. Issues discussed may include accrual, protocol compliance, and general toxicity. Outcome results must not be discussed during the open session. Following the open session, a closed session involving the DSMC, and study statistical staff will be held to allow the DSMC opportunity to discuss the general conduct of the trial and all outcome results, including toxicities and adverse events, develop recommendations, and take votes as necessary.

5.6 DSMC Recommendations

DSMC recommendations should be based on results for the trial being monitored as well as on data available to the DSMC from other studies. It is the responsibility of the research team to ensure that the DSMC is kept apprised of non-confidential results from other related studies that become available. It is the responsibility of the DSMC to determine the extent to which this information is relevant to its decisions related to the specific trial being monitored. A written copy of DSMC recommendation(s) will be given to the research team and QASM. If the DSMC recommends that a study be changed for patient safety or efficacy reasons, or that a study be closed early because of slow accrual, the research team must act to implement the change as expeditiously as possible. In the unlikely situation that the research team does not concur with the DSMC, then the QASM chair must be informed of the reason for disagreement. The research team, DSMC Chair, and the QASMC Chair will be responsible for reaching a mutually acceptable decision about the study. Confidentiality must be maintained
during these discussions. However, in some cases, relevant data may be shared with other selected trial investigators and/or QASMC members to seek advice to assist in reaching a mutually acceptable decision. If a recommendation is made to change a trial for other than patient safety or efficacy reasons or for slow accrual, the DSMC will provide an adequate rationale for its decision.

5.7 Release of Outcome Data

In general, outcome data should not be made available to individuals outside of the DSMC until accrual has been completed and all patients have completed their treatment. At this time, the DSMC may approve the release of outcome data on a confidential basis to the trial principal investigator for planning the preparation of manuscripts and/or to a small number of other investigators for purposes of planning future trials. Any release of outcome data prior to the DSMC's recommendation for general dissemination of results must be reviewed and approved by the DSMC.

5.8 Confidentiality Procedures

No communication, either written or oral, of the deliberations or recommendations of the DSMC will be made outside of the DSMC except as provided for in this policy. Outcome results are strictly confidential and must not be divulged to any non-member of the DSMC. Each member of the DSMC, including non-voting members, must sign a statement of confidentiality.

5.9 Conflict of Interest

DSMC members are subject to the Washington University Medical School and Siteman Cancer Center policies regarding standards of conduct. Individuals invited to serve on the DSMC as either voting or non-voting members will disclose any potential conflicts of interest, whether real or perceived, to the trial principal investigator and the appropriate Siteman Cancer Center official(s), in accordance with the institution's policies. Conflict of interest can include professional interest, proprietary interest, and miscellaneous interest as described in the NIH Grants Policy Statement, Page II-12, and 45 CFR Part 94. Potential conflicts that develop during a member's tenure on a DSMC must also be disclosed. Decisions concerning whether individuals with potential conflicts of interest or the appearance of conflicts of interest may participate in a DSMC will be made in accordance with the institution's policies.

5.10 DSM Review Procedures

Requests for and receipt of DSM reports are logged into the SCC administrative database. DSM reports submitted to the QASMC office in the preceding calendar month will be reviewed at the next monthly QASMC meeting. DSM reports are assigned to a primary faculty advisor and reviewer by all Committee members for severity and frequency of adverse events, accrual rate, reporting of SAEs to HRPO and the representation of risks in the consent.

After full-committee discussion, the Committee will make one of the following decisions:

1. **Approved** – no further action required.
2. Approved with Comments – a letter will be sent to the research team or DSM Committee
3. Contingent Approval – minor modifications requested; a written response is required from the PI that will be reviewed by the QASMC chair.
4. Deferred – Committee has concerns that require a written response from the PI to be reviewed by the full Committee.

When a revision is requested, the research team should prepare the appropriate IRB-required documents and include these with the response to QASMC. Once the revisions are reviewed by QASMC, the IRB submission will be forwarded to PRMC for further processing. In all cases, a copy of the final report and approval letter will be forwarded to the research team.

6.0 QASMC Policies and Procedures: Quality Assurance (QA) Audits

6.1 Types of Quality Assurance

Two distinct types of monitoring are performed. The first is provided by the PRMC. All cancer-related studies are initially reviewed for scientific merit. Subsequently, the PRMC reviews the overall progress of each study to assure that the projected accrual goals are being met, and that over-accural is avoided. The PRMC Policies and Procedures are available on the SCC web site at: http://www.siteman.wustl.edu/prmc.aspx. The second type of monitoring is provided by the QASMC. It reviews the quality of trial execution and ensures that the risks of the study, as reported by the research team, are not excessive. Through direct comparison of the recorded research data with the primary medical record in a random sample of cases, this review process enhances the delivery of accurate and reliable research trial data and results for data analysis. At the same time, compliance with regulatory requirements for the protection of human subjects and investigational drug accountability (if applicable) will be checked. Additionally, the QASMC review process provides educational support to SCC members conducting cancer research regarding issues related to data quality, data management and other aspects of cancer research quality assurance.

6.2 Protocol Selection and Notification of Audit

The QASMC audits all institutional therapeutic trials, as well as other research trials (e.g., diagnostic trials) as designated by the PRMC. The PRMC decides, generally at the time of approval, which institutional non-therapeutic research trials will be audited by the QASMC. The QASMC will also consider auditing other trials if requested by a PI, for example, as an interim cooperative group trial review. If Washington University is the coordinating center, each site will be audited by Siteman Cancer Center personnel, unless the outside institution has an auditing mechanism in place and can provide a report. The audit by SCC personnel will take place at the outside institution if there are funds in place (responsibility of the PI). If there are no funds for travel, the auditor’s schedule does not allow for travel, or there are less than five subjects at a site, the outside sites will be asked to send copies of all audit materials. If Washington University is the coordinating center and the audit of the outside sites will occur at SCC, the audit notification will be sent to the SCC Research Coordinator, and it is the responsibility of the Research Coordinator to obtain audit materials in this situation. If there are funds for travel, the SCC Research Coordinator will assist in contacting and planning the audit with the outside institution. Notification of an upcoming audit will be sent to the research team.
one month ahead of the audit. Once accrual numbers are confirmed, and approximately 30 days prior to the audit, a list of the cases selected for review will be sent to the research team. However, if during the audit the need arises to review cases not initially selected, the research team will be asked to provide the additional charts within two working days.

6.3 Case Selection

Generally, a minimum number of cases equivalent to at least 10% of the subjects accrued to the study will be reviewed. The number of cases selected for review will be determined as follows:

- All cases if current enrollment is \( \leq 10 \);
- 10 cases if the number enrolled is 11-100;
- 10% of cases if the number enrolled is > 100 (up to a maximum of 50 cases)
- For studies with greater than 10 patients, the cases should be randomly selected, but divided 2:8 between those enrolled prior to and since the last audit so that the sample is representative of the full spectrum of the enrollment period. In the case of studies that enroll donors (e.g., bone marrow transplant studies), 3 donor/recipient sets will also be randomly selected and reviewed. For studies qualifying for abbreviated audits (per the risk-based auditing guidelines described in section 6.5), a total of 5 cases will be selected if the number enrolled is \( \leq 100 \).

6.3.1 Multi-Institutional Trials

For sites with 5 or more patients, the case selection process is identical to the above section.

The patient lists for all sites with fewer than 5 patients will be condensed to one list and the cases will be selected using the above process.

6.4 Audit Frequency

The first audit of a study should occur approximately 6 months after the first subject is enrolled, or earlier depending on accrual goals and actual recruitment. If no subjects have been enrolled 12 months after a study opens to accrual, the QASMC will defer the study to PRMC. Subsequent audits are to occur at a frequency specified by the QASMC during recommendation deliberation for each audit report. Typically, studies are re-audited annually, but may be audited biennially, semi-annually, or after 3 months (e.g., for cause, or accrual driven). The QASMC may use its discretion to waive or postpone an audit for small non-therapeutic studies with very low risk (e.g., auditor workload). Studies will not be re-audited until at least 2 new patients have been enrolled since the prior audit.

6.5 Risk-Based Auditing

Because the types of studies audited vary widely, a risk-based approach to auditing has been adopted in order to balance the level of review and the level of risk associated with a given study (See Appendix E). Risk-based auditing guidelines are used to identify studies that qualify for abbreviated review at the time of subsequent audit. For abbreviated audits, 5 cases are selected for review if the total enrolled is <100. All 5 cases selected for abbreviated audit will have been enrolled since the prior audit. If <5 patients have been enrolled since the prior audit, all 5 cases
selected for abbreviated audit should be previously unaudited, if possible.

6.6 Low Accrual

At the time that a study is due for audit, total subject accrual will be checked for accuracy and completeness and compared with the SCC Registry. If accrual is slower than projected, the research team will be referred to Section 4.4.1, *Annual Renewals* of the PRMC Policies and Procedures, and put on alert that future renewals may be jeopardized if accrual is not improved in the interim.

6.7 QA and Committee Procedures

In preparation for the audit a QA Advisor is assigned and the protocol is reviewed with the QA Specialist. In general, the QA Specialist will conduct the initial record review. A meaningful and random sample of clinical records, radiologic studies and other diagnostic data, pathology and cytochemistry reports, operative reports, laboratory data, HRPO reviews and consents, and investigational drug logs (if applicable) are examined to ensure that data management practices in the SCC adhere to protocol guidelines, that submitted information is accurate and complete, and that all federal human subjects regulations and NCI guidelines for investigational drugs have been followed. At the conclusion of the audit, the QA Specialist will discuss the findings with the QA Advisor and, as needed, with the research team to obtain clarification of apparent deficiencies. Following the QA audit, a report is drafted. The findings are presented at the following month’s QASMC meeting for discussion and recommendations. After the meeting, the QA Specialist revises the draft report and sends the final report and cover letter to the research team. If a written response from the PI is required, it is due in the Protocol Office within 30 days of the date of the letter.

6.7.1 Discussion of Protocol Problems

It is important to note that an inclusive and precise definition of what constitutes unacceptable audit findings is difficult to construct. Rather than trying to develop an inclusive quantitative definition, the QASMC will attempt to use a common set of problems that will result in a request to the research team for further assessment. Examples include the following:

- Lack of annual HRPO and/or PRMC reviews for protocol;
- Lack of semi-annual DSM reports;
- Major addenda not reviewed on a timely basis or not submitted to HRPO;
- Subject entered prior to HRPO approval;
- Consent not obtained or consent form not current;
- Subject does not meet eligibility;
- Pre-treatment tests of major importance not performed;
- Data forms do not reflect medical records;
- Incorrect treatment given, wrong dose (>10%) given, wrong timing with no reason or explanation, failure to modify doses according to protocol, wrong route of administration, failure to document drug administration, or error in concomitant medications;
- Failure to obtain the required protocol baseline studies to effectively assess toxicity;
• Repetitive failure to get the necessary follow-up studies to measure toxicity;
• Failure to characterize toxicity or grade;
• Not reporting Grade 4 drug toxicity, not filing required Serious Adverse Event Reports with the HRPO, or not reporting treatment-related deaths to the HRPO;
• Failure to assess disease status according to the protocol guidelines.

The QA Specialist shall close-copy any managers of clinical areas that are involved in unacceptable audit findings on the final audit report (i.e. pharmacy, nursing, in-patient floors, infusion staff, etc.). It is the responsibility of the research team to ensure that the appropriate clinical managers address these findings involving their staff.

### 6.7.2 Evaluation of QA Findings

The assigned QA Advisor presents the audit assessment at the QASMC monthly meeting. The Committee then chooses an initial recommendation from the following options:

1. **Approved.** No deviations were discerned and no response from the research team is needed.
2. **Contingent.** Minor issues were raised by the audit. A written response is required from the PI that will be reviewed by the QASMC chair.
3. **Deferred.** Serious issues were raised in the audit, which require further input from the PI. The full Committee will review the written response from the PI.

When a revision is requested, the research team should prepare the appropriate IRB-required documents and include these with the response to QASMC. Once the revisions are reviewed by QASMC, the IRB submission will be forwarded to PRMC for further processing.

**Given the importance of timely review, accrual will be suspended on those studies where the response to the audit is overdue by more than 120 days.** A reminder is sent approximately 30 days after the due date. If a response is not received in the Protocol Office within 90 days of its due date, a final reminder will be sent via email. If the response is not received within the next 30 days, a notice will be sent to the HRPO, PRMC and the research team stating that accrual is suspended until further notice from the QASMC. HRPO will notify the OHRP and FDA (as applicable) in accordance with the requirement that all suspensions and closures be reported to these agencies. Once the response is received and approved by the QASMC, notice will be sent to resume the study.

### 6.7.3 Evaluation of PI Response

The chair or Committee will review the response, as described above and select one of the following decisions:

1. **Approved-** Response Acceptable
2. **Approved with Comments** – Minor issue(s) to be addressed in a letter.
3. **Contingent Approval** – Minor Issue(s) to be addressed and response to be
reviewed by Chair.

4. **Deferred** – Serious issue(s) unresolved; response to be reviewed by Committee

5. **Disapproved** – Recommendation of PRMC to close study.

If the decision is made to approve the study for continuation, the PRMC will be notified via the QASMC meeting minutes. If the audit response receives contingent approval or is deferred, the PI will be required to provide an additional written response and the review process will be repeated until a decision by the QASMC is made to either approve or disapprove. When a decision is made to disapprove the study the findings will be submitted to the PRMC for review and discussion by the full Committee.

### 7.0 Preparation for QA audit

#### 7.1 Research Team Responsibilities

The research team will need to prepare for the QA review by gathering **all source documentation** pertaining to the selected cases. For multi-modality studies, documentation from all modalities must be made available. These items should include:

- Hospital and/or outpatient charts (as relevant to the trial);
- Imaging reports, laboratory results and other special studies as required by the protocol (if not in patient chart);
- Operative, pathology and radiotherapy reports (if not in patient chart);
- Original signed and dated consent form for each patient (copy if original is not available);
- Completed data collection forms or access to database if entered electronically.
- The HRPO initial, renewal and amendment approvals
- Annual reports submitted to the HRPO
- All versions of the protocol and consent forms since initial HRPO approval
- Records regarding the disposition of investigational drugs, when applicable, specifically copies of drug orders, return receipts and NCI Drug Accountability Records

In addition to providing the above, it is recommended that the research team flag the charts to indicate eligibility documentation, pre-treatment requirements, treatment cycles, study tests, etc. in order to expedite the QA review procedure.

#### 7.2 Day of QA Review

The research team will make conference room arrangements. The PI and research coordinator responsible for the study being audited are not required to be present at the review. However, the QASMC recommends that the research coordinator in particular be on-site in the event there are questions.
8.0 Appendices

A. QASMC Members and Support Staff

B. DSM/Plan Summary

C. Sample Wording of DSM Plans for Investigator-Initiated Institutional Clinical Trials

D. Audit Scheduling Guidelines

E. Risk-Based Auditing Schema
## Appendix A

### QASMC Members and Support Staff

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<tr>
<th>Member</th>
<th>Discipline</th>
<th>Email</th>
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<tbody>
<tr>
<td>Nancy Bartlett, M.D. (Chair)</td>
<td>Medical Oncology</td>
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<td>Michael Naughton, M.D.</td>
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<tr>
<th>Support Staff</th>
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<th>Email</th>
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Appendix B

DSM Plan Summary

In an effort to assist investigators, the following is a brief summary of the DSM requirements, including sample DSM plans. In general, these guidelines are meant to help develop plans for SCC investigator-initiated trials. The cooperative groups have appropriate data and safety monitoring plans for all protocols and site-specific institutional plans are not needed. In addition, given the stringent FDA reporting guidelines, most pharmaceutical companies have DSM plans in place. It remains the responsibility of the institutional principal investigator to confirm that the DSM plan is outlined in an industry-sponsored protocol, or to obtain a description of the sponsor’s plan (Standard Operating Plans) for submission of the protocol to the SCC Protocol Review and Monitoring Committee (PRMC).

In an effort to insure that all protocols have a DSM plan, the plan should be included in a separate section of the protocol and referenced in the protocol index. All DSM plans must include an assurance that summary reports will be provided to the QASMC at least every 6 months. Templates for these reports are provided on the Siteman Cancer Center webpage http://www.siteman.wustl.edu/ContentPage.aspx?id=4588.

Guidelines for Data and Safety Monitoring Plans

1. NIH requires a data and safety monitoring plan (DSMP) for all clinical trials.
   • Observational studies and those that do not test interventions are not clinical trials.
   • Studies involving molecular or imaging tests are considered clinical trials only if the information from the diagnostic test may affect the outcome of study subjects or if the test itself imposes a risk to the study subject.

2. For ease of documenting compliance, the DSM plan should be described in a separate section of the protocol and referenced in the protocol index (sample plans provided below).

3. Essential elements of a DSM plan
   • Describe who will monitor the data and how frequently.
   • Describe the mechanism for evaluating and reporting adverse events, including which agencies will receive reports. All reports must go to the HRPO and the QASM Committee. In addition, depending on the study, reports may need to go to the study sponsor and/or the FDA.
   • Indicate how often reports will be provided to the QASMC.
   • Multi-institutional trials must identify who will be preparing and distributing timely summary reports of adverse events to all involved institutions.

4. Data and Safety Monitoring Committees
   • The need to have a DSMC for trials other than Phase III studies is at the investigators’/institutions’ discretion. [“Nor does NIH/NCI policy require that formal DSMCs be constituted for clinical trials other than Phase III, though investigators or institutions may wish to do so for certain non-Phase III trials involving particular risk, complexity, likely decisions about early stopping, or the need to obviate conflict of interest.”]
   • As regards the “discretionary” formation of DSMCs, the current NCI- approved SCC institutional DSM plan states that in addition to Phase III studies, a DSMB will be established if the trial
     a. is multi-institutional (see below)
     b. involves a high-risk intervention (gene therapy, cancer vaccine)
     c. has a blinded treatment arm
     d. has large expected accrual (n>300)
   • Based upon on-going discussions with NCI, it is apparent that, despite our institutional plan, we have some “latitude” in allowing participation of our investigators in multi-institutional studies initiated at other sites, even if that site does not require a DSMB. This would apply especially to Phase II studies testing drugs for which there is already significant toxicity information (e.g., a Phase II study of an FDA-approved drug for a non FDA-approved indication). However, it is imperative that an adequate mechanism be in place for monitoring the protocol and reporting adverse events to all involved investigators.

5. Data and Safety Monitoring Reports for Institutional Studies
   • Semi-annual report to QASM Committee for review
   • Report prepared by investigator for Phase I-II, by DSMB for Phase III

page 1 of 20
• Information to include in report
  a. Number pts enrolled/treated
  b. Summary of all adverse events (regardless of grade/attribution)
  c. Response evaluation (Phase II only)
  d. Summary of any recent literature reporting developments that may affect safety or ethics of study.
Appendix C

Sample Wording of DSM Plans for Investigator-Initiated Institutional Clinical Trials

Phase I Studies
The principal investigator will review all patient data at least monthly (or before each dose-escalation if occurring sooner than monthly), and provide a semi-annual report to the QASM Committee. This report will include
1. protocol title, HRPO protocol number, and activation date of the study.
2. number of patients enrolled to date on each cohort
3. date of first and most recent patient enrollment
4. summary of all adverse events regardless of grade and attribution for each cohort
5. synopsis of basis for decisions to halt or continue dose-escalation
6. summary of any recent literature that may affect the ethics of the study.
The study principal investigator and clinical research associate will monitor for serious toxicities on an ongoing basis. Once the principal investigator or clinical research associate becomes aware of a serious adverse event, the SAE will be reported to the HRPO and QASM Committee [add other reporting requirements here if applicable, e.g. sponsor, FDA, collaborating institutions] within 15 days.

For multi-institutional Phase I studies consider an additional paragraph.
To insure safe dose-escalation, all sites will be required to submit complete data to the principal investigator at the end of each course of treatment. Serious adverse events occurring at all sites will be reported to the principal investigator within 24 hours. The principal investigator will distribute SAE reports to all participating sites within 15 days of becoming aware of the event. The principal investigator will review data from all sites monthly. The semi-annual DSM reports will be distributed to the responsible investigator at each participating institution.

Phase II Studies
The principal investigator will review all patient data at least every six months, and provide a semi-annual report to the QASM Committee. This report will include
1. the protocol title, IRB protocol number, and the activation date of the study.
2. the number of patients enrolled to date
3. the date of first and most recent patient enrollment
4. a summary of all adverse events regardless of grade and attribution
5. a response evaluation for evaluable patients
6. a summary of any recent literature that may affect the ethics of the study.
The study principal investigator and clinical research associate will monitor for serious toxicities on an ongoing basis. Once the principal investigator or clinical research associate becomes aware of a serious adverse event, the SAE will be reported to the HRPO and QASM Committee [add other reporting requirements here if applicable, e.g. sponsor, FDA, collaborating institutions] within 10 working days.

For multi-institutional Phase II studies consider an additional paragraph.
Serious adverse events occurring at all sites will be reported to the principal investigator within 24 hours. The principal investigator will distribute SAE reports to all participating sites within 15 days of becoming aware of the event. Semi-annual DSM reports will include a summary of the data from all sites, including adverse events and responses. DSM reports will be distributed to the responsible investigator at each participating institution.

Phase III Studies
The principal investigator will review all patient data at least every six months. In addition, an independent DSMB will review all data at least every six months. The DSMB will consist of [names of members here including at least two clinical investigators and a biostatistician]. Curriculum vitae or biosketches for all DSMB members will be provided to the PRMC with the initial submission of this protocol. Members of the DSMB have been given a copy of the section of the Siteman Cancer Center Data and Safety Monitoring Plan that describes the responsibilities of a DSMB and have agreed to uphold these responsibilities.
Appendix D

Audit Scheduling Guidelines

The first audit of a study should occur approximately 6 months (±2 months) after the first subject is enrolled, or earlier depending on accrual goals and actual recruitment. If no subjects have been enrolled 12 months after a study opens to accrual, QASMC will defer the study to PRMC. Subsequent audits are to occur at a frequency specified by the QASMC during recommendation deliberation for each audit report. Typically, studies are re-audited annually, but may be audited biennially, semi-annually, or after 3 months (e.g., for cause, or accrual driven). QASMC may use its discretion to waive or postpone an audit for small non-therapeutic studies with very low risk (e.g., auditor workload). Studies will not be re-audited until ≥2 new patients have been enrolled since the prior audit.

Note: Audit dates must be confirmed by regulatory and clinical team managers ≥3 months (preferably ≥6 months) in advance of the due date.

Guidelines for Rescheduling QA Audits:

1. Audits will be rescheduled only in the case of an emergency or unavoidable situation, and not for the sake of convenience. Specifically, “staff turnover” will not be considered a sufficient rationale for rescheduling, as the expectation is that study personnel are routinely maintaining studies, and that seniors/managers/investigators are routinely overseeing this process. There may be times when seniors and/or managers may need to step in to prepare a study for audit.
2. Audits will not be rescheduled if the study is already ≥12 weeks overdue. If a study will not be ready for audit by the scheduled date, the study will be suspended to give the team time to prepare for audit.
3. Audits will be rescheduled for a date within 4-8 weeks before or after their due dates, on the condition that
   a. a time slot is available, or can be easily made available;
   b. the same manager requesting the schedule change is willing to reschedule one of his/her other studies
4. Advanced notice of ≥12 weeks will be required in order to reschedule an audit. In extreme cases, notice of ≥8 weeks may be allowed. This minimum lead time will allow 2 weeks to finalize the date change, 2 weeks to finalize the patient list, and 4 weeks for the coordinator to prepare for audit.

Guidelines to Determine the End of Audits:

QA audits are not required for studies that are permanently closed to enrollment EXCEPT when:

a. The study has been audited only once before, and/or
b. ≥5 subjects enrolled since the prior audit (or ≥10% of all subjects, if the overall goal is >50), and/or
   ≥15 subjects were on treatment at some time since the prior audit (or ≥30% of all treated subjects), and/or on an as-needed basis at the discretion of the QASMC committee
Appendix E
Risk-Based Auditing Schema

Institutional study, and QASMC audit required  

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<td>QASMC does not audit</td>
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Study has ANY of the following:
- Phase I, or phase I portion of phase I/II study, or phase III
- First audit of the study (6 months after 1st pt)
- New investigator (1st trial as PI, or <12 months as PI)

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<td>WUSM is a secondary site, Audit per QASMC guidelines? (regulatory determines this)</td>
<td>QASMC audits per coordinating center’s guidelines (provided at start of enrollment)</td>
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Patient safety or significant data integrity concerns, per QASMC

Study has TWO or more of the following:
- IND/IDE held by WUSM
- WUSM is coordinating center for multicenter study
  (if yes for phase III study, full audit is required)
- Phase II or Pilot study
  (or phase II portion of phase I/II study)

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<tr>
<td>FULL QASMC Audit (10 patients, 5 days)</td>
<td>Abbreviated QASMC Audit (5 patients, 2-3 days)*</td>
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*If abbreviated QASMC audit is required, this must meet the auditing requirements of the coordinating center when WUSM is a secondary site. Re-audit may occur in 6, 12, 18 or 24 months, as the QASMC recommends.