Registration and Credential Repository (RCR) and Delegation of Tasks Log (DTL)

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NIH NATIONAL CANCER INSTITUTE

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Agenda / Objectives

- Why are we doing this?
- What new applications are in the works?
- How do we plan to support the launch of the applications?
- When will we launch?

Background – Joint FDA / EMA Audit

Gaps Identified in Current System

- FDA Form 1572 documentation
  - Missing practice sites, labs, IRBs
- No record of study-specific responsibilities assigned at the practice site level
- Failure to verify that personnel conducting research activities were qualified to do so on the protocol
- Lack of protocol-specific training

Registration and Credential Repository

NCI's Solutions and Enhancements

- **Registration and Credential Repository (RCR)**
  - Provide a self-service online registration application with electronic signature and submission capability (replaces paper-based annual registration process)
  - Define specific Registration Types – Investigator (IVR), Non-Physician Investigator (NPIVR), Associate Plus (AP), Associate (A), and Associate Basic (AB)
  - Registration Type will dictate documentation requirements – FDA Form 1572, Financial Disclosure Form (FDF), Biosketch, Designee Form, and enhanced training requirements
  - Registration Type will permit assignment of certain roles for study activities and access to NCI applications

Registration Types

- Investigator (IVR)
- Non-Physician Investigator (NPIVR)
- Associate Plus (AP)
- Associate (A)
- Associate Basic (AB)

Replaces Investigator and Associate Person Types

NOTE: All registration types will ***require*** an Identity and Access Management (IAM) account. IVR, NPIVR, and AP registration types will use their IAM username and password to access RCR and to ***electronically sign*** and submit registration credentials captured in RCR.

RCR registration is required for IVR, NPIVR and APs

New Registration Types – Documentation Requirements

Documentation Required	IVR	NPIVR	AP	A	AB
FDA Form 1572	✔	✔			
Financial Disclosure Form	✔	✔	✔		
Biosketch (education, training, employment, license, and certification)	✔	✔	✔		
HSP/GCP training	✔	✔	✔		
Agent Shipment Form (if applicable)	✔				
CV (optional)	✔	✔	✔		

Registration Documents: FDA Form 1572

Registering individual will populate their RCR profile with:

- Practice Sites (box 3) queried from CTEP's Enterprise Core Module (ECM) application
  - ***will define sites at which an IVR or NPIVR can be requested to be claimed in RUMS by site administrators or claimed in RSS by NCTN roster owners***
- Labs (box 4) queried from Clinical Laboratory Improvement Amendments (CLIA) web service
- IRBs (box 5) queried from Office for Human Research Protections (OHRP) web service
  - ***will define IRBs that can be referenced for both site registrations (Site - Protocol PI), patient registrations (consenting and "enrolling" [i.e., credit, treating, drug shipment] investigator), and patient transfers (receiving [transfer to] investigator)***
- Electronic signature (IAM username and password) and date

NOTE: FDA Form 1572 is intended (pending final acceptance by the FDA) to continue to be annual and investigator (i.e., not study) specific.

Registration Documents: Biosketch

Registering individual (or RC) will populate their RCR profile with:

- Education, Training, and Employment
- Professional License / Certifications
- Board Certifications
- ***Human Subject Protection (HSP) and Good Clinical Practice (GCP) training***, including a scanned copy of the certificates
- Electronic signature (IAM username and password) and date

NOTE: Information on the current Supplemental Investigator Data Form (IDF) will be separated into the “Biosketch” and the “Designee Form”.

NOTE: Completion of the Biosketch will be required to ensure a standardized collection of the required information (Attachment of a CV will be optional)

Financial Disclosure

Required for IVRs, NPIVRs & APs

Do you currently have or have you at any time in the past year had any financial arrangement entered into between the sponsor of the covered study and the clinical investigator involved in the conduct of the covered study, whereby the value of the compensation to the clinical investigator for conducting the study could be influenced by the outcome of the study?*

○ Yes ◉ No

Have you had any significant payments of other sorts made on or after February 2, 1999, from the sponsor of the covered study, such as a grant to fund ongoing research, compensation in the form of equipment, retainer for ongoing consultation, or honoraria?*

○ Yes ◉ No

Do you currently have or have you at any time in the past year had any proprietary interest in the product tested in the covered study held by the clinical investigator?*

○ Yes ◉ No

Do you currently have or have you at any time in the past year had any significant equity interest, as defined in 21 CFR 54.2(b), held by the clinical investigator in the sponsor of the covered study?*

○ Yes ◉ No

Requires responses to 4 questions and electronic signature

Registration Documents: Shipping Information Form

Registering investigator will populate their RCR profile with:

- Shipping CTEP site code and site name
- Shipping address and contact information (phone, email)
- Shipping Designee (SD)
- Ordering Designees (OD)
- Standardized suggestions (e.g., “Primary Shipping Designee” address or “Preferred Shipping Address”) will be offered based on Practice Sites selected
- Electronic signature (IAM username and password) and date

NOTE: Only available for IVR registration type and only required if requesting shipment of investigational agent from PMB.

Registration Type – Investigator (IVR)

Roles (application)

- Protocol PI for CTEP or DCP sponsored protocols
- Site - Protocol PI (i.e., IRB PI) for CTEP or DCP sponsored studies (Regulatory Support System [RSS])
- Consenting or “Enrolling” (Credit, Treating, Drug Shipment) investigator (Oncology Patient Enrollment Network [OPEN])
- Drug Shipment investigator (Online Agent Order Processing [OAOP])
- Receiving (transfer to) investigator (Transfer and Update Module [T&UM])
- Site Investigator (RAVE)

Registration Type – Non-Physician Investigator (NPIVR)

IVR | **NPIVR** | AP | A | AB

Roles (application)

- Protocol PI for select DCP or CTEP sponsored studies
  - protocol flagged by sponsor as “NPIVR eligible as Protocol PI”
- Site - Protocol PI for select DCP sponsored studies (RSS)
  - protocol flagged by sponsor as “NPIVR eligible as Site / Protocol PI”
- Consenting or “Enrolling” (Credit, Treating) investigator for select DCP sponsored protocols (OPEN)
  - protocol flagged by sponsor as “NPIVR eligible as Enrolling Investigator"
- Receiving (transfer to) investigator for select DCP sponsored studies (T&UM)
- Site Investigator for select DCP sponsored studies (RAVE)

NOTE: NPIVR cannot be a drug shipment investigator in OPEN or OAOP.

Registration Type – Associate Plus (AP)

Roles (application)

- Registrar role (OPEN)
- Rave CRA, CRA (Lab Admin), SLA roles (RAVE)
- Primary site roles such as Site Administrator, Data Administrator, LAPS Administrator, NCORP administrator (RSS)

Registration Type – Associate (A)

Roles (application)

- Administrative roles (RSS / CIRB / TRIAD)
- CTSU website access
- Shipping Designee (OAOP)
- Ordering Designee (OAOP)
- Registration Coordinator (RCR)
- Rave Read-Only (RAVE)

NOTE: No change to the current IAM registration process.

Registration Type – Associate Basic (AB)

IVR | NPIVR | AP | A | **AB**

Roles (application)

- Personnel (e.g., pharmaceutical company employees) who need to register; but, who ***cannot*** be granted system or web access
- Administrative roster (RSS)
- Biospecimen protocol PI (PATS)
- Biospecimen proposal PI (NCI NAVIGATOR)

NOTE: No change in the current IAM registration process.

NOTE: IAM account will ***not*** be authenticated for system access.

Migration Activities: Person Types to Registration Types

- Person Types of *Associate* and *Investigator* will be replaced with the five Registration Types in CTEP, DCP, CIRB, and CTSU systems
- New persons will be given a unique CTEP ID and existing persons will retain their assigned CTEP ID
  - Updates to Registration Type will *not* change a person's CTEP ID
- Investigator records will be migrated to the *IVR* Registration Type
- Users currently registered as *Associate* and assigned as a Protocol PI or Site-Protocol PI for nontreatment studies will be migrated to the *NPIVR* Registration Type
- Users currently registered as *Associate* and assigned the OPEN Registrar or Rave CRA, CRA (Lab Admin), or SLA roles as well as individuals with a "Primary Site Role" will be migrated to the *AP* Registration Type
- All other users will be retained as an *Associate* Registration Type

RCR: Process Changes (IVR, NPIVR, AP)

- All users **must** have an IAM account
- Existing users will complete their re-registration within RCR
- New users will access RCR to submit their initial registration (after first obtaining an IAM account)
- HSP/GCP training details and certificates will be required for initial registration and for annual re-registrations (IVR, NPIVR, AP)
- Information related to education, training, employment, professional license, and board certification required and electronically captured (IVR, NPIVR, AP)
- Practice sites, IRBs, and labs electronically captured and ***control downstream processes*** (IVR, NPIVR)
- Electronically sign and submit registration packet to NCI (IVR, NPIVR, AP)

RCR: Business Rule Changes

- Investigators and NPIVRs must list practice site on their FDA Form 1572 to be claimed by a roster owner at that site
- Investigators and NPIVRs must list all IRBs providing coverage for NCI-supported studies at the listed practice sites on their FDA Form 1572.
  - IRB number on site registration documentation (RSS) must be listed on the Site - Protocol PI's 1572
  - IRB number covering the consenting or "enrolling" (credit, treating, drug shipment) investigator (OPEN) or the receiving (transfer to) investigator (T&UM) must be listed on the respective investigator's 1572

RCR: Business Rule Changes

- Persons requiring write access to OPEN or RAVE must hold a Registration Type of IVR, NPIVR, or AP
- Persons holding a primary site role (e.g., Site Administrator, Data Administrator, LAPS Administrator, NCORP administrator) will require a minimum AP Registration Type
- Persons reverting to an Associate or AB Registration Type will have their OPEN and RAVE roles automatically inactivated
- Persons with an AB role can be claimed at administrative locations only and will not have access to any systems or websites

RCR: Final Thoughts

- Five “Registration Types” with differing credential collection and differing potential roles
- Online registration for all “Registration Types”
  - via IAM for *AB* and *A*
  - via RCR for *AP, NPIVR*, and *IVR* (requires electronic signature using IAM username and password)
- Enhanced, structured collection of person registration and credential data, particularly practice sites, IRBs, and HSP/GCP training, for utilization across CTEP, DCP, NCI CIRB, and CTSU systems
- Availability of a single source of electronic person registration documentation (FDA Form 1572, Biosketch, HSP/GCP training) to NCI, clinical site, and grantee operations office staff at all times as well as to the FDA when required

Summary of Registration Types

Registration Type	Abb.	Registration Requirements	Business Rules
Investigator	IVR	Electronic annual registration using RCR • FDA Form 1572 • Financial Disclosure Form • Biographical sketch (Biosketch) • Agent Shipment Form (if applicable) • Human Subjects Protection* • Good Clinical Practice * • Optional CV*	• Site must be on the 1572 to be claimed on a roster • IRB number on site registration must be on the Site / Protocol PI's 1572 • IRB number covering the treating, consenting, credit, drug shipment, receiving (transfer to) investigator must be listed on their 1572
Non-Physician Investigator	NPIVR	Electronic annual registration using RCR • FDA Form 1572 • Financial Disclosure Form • Biographical sketch (Biosketch) • Human Subjects Training * • Good Clinical Practice * • Optional CV*	• Site must be on the 1572 to be claimed on a roster • IRB number on site registration must be on the Site / Protocol PI's 1572 • IRB number covering the treating, consenting, credit, receiving (transfer to) non-physician investigator must be listed on their 1572
Associate Plus	AP	Electronic annual registration using RCR • Financial Disclosure Form • Biographical sketch (Biosketch) • Human Subjects Training* • Good Clinical Practice* • Optional CV*	Must have an AP, NPIVR, or IVR registration status to hold the OPEN Registrar role , RAVE "write" roles, or primary site roles
Associate	A	Electronic annual registration using IAM	May access CTSU website and systems including view access to OPEN and RAVE
Associate Basic	AB	Electronic annual registration using IAM	Cannot access CTEP, DCP, CIRB, or CTSU systems

* Upload hardcopy document

NCI Delegation of Tasks Log (DTL)

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NCI's Solutions and Enhancements

- **Delegation of Tasks Log (DTL)**
  - Define and maintain an online DTL for designated studies conducted at a site
  - Define a standard list of NCI research tasks to be part of the DTL
  - Delegate research tasks based on qualifications and Registration Type

- **OPEN update**
  - Addition of consenting investigator field during registration

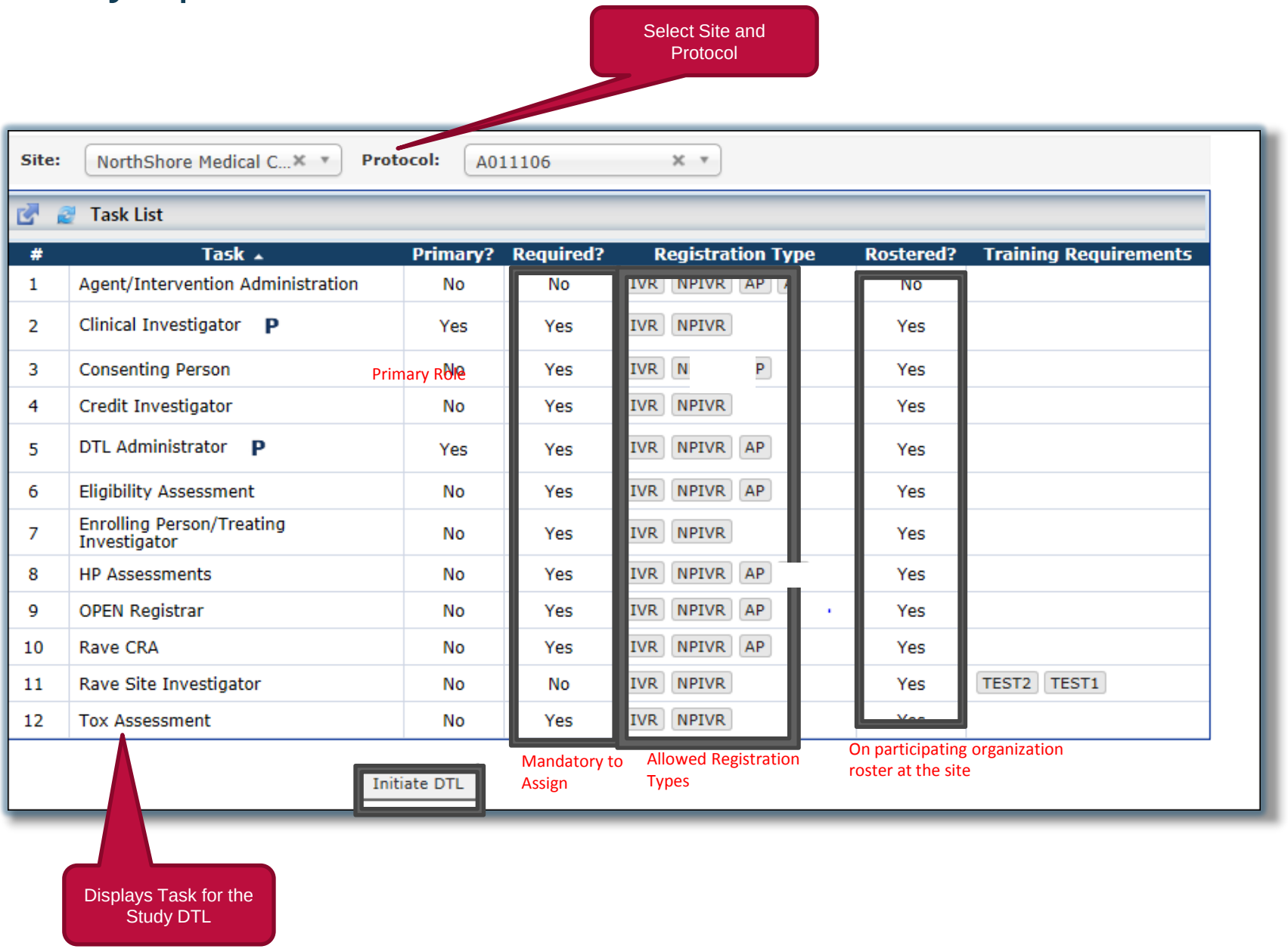
Goals of the DTL

- Identify the Clinical Investigator (CI) and Delegation of Tasks Log Administrator (DTLA) for every protocol
- Provide complete list of investigators AND sub-investigators that make a direct and significant contribution to the clinical data
- Identify individuals that can perform designated tasks on the protocol at the site level
- Track changes in task assignment over study lifecycle

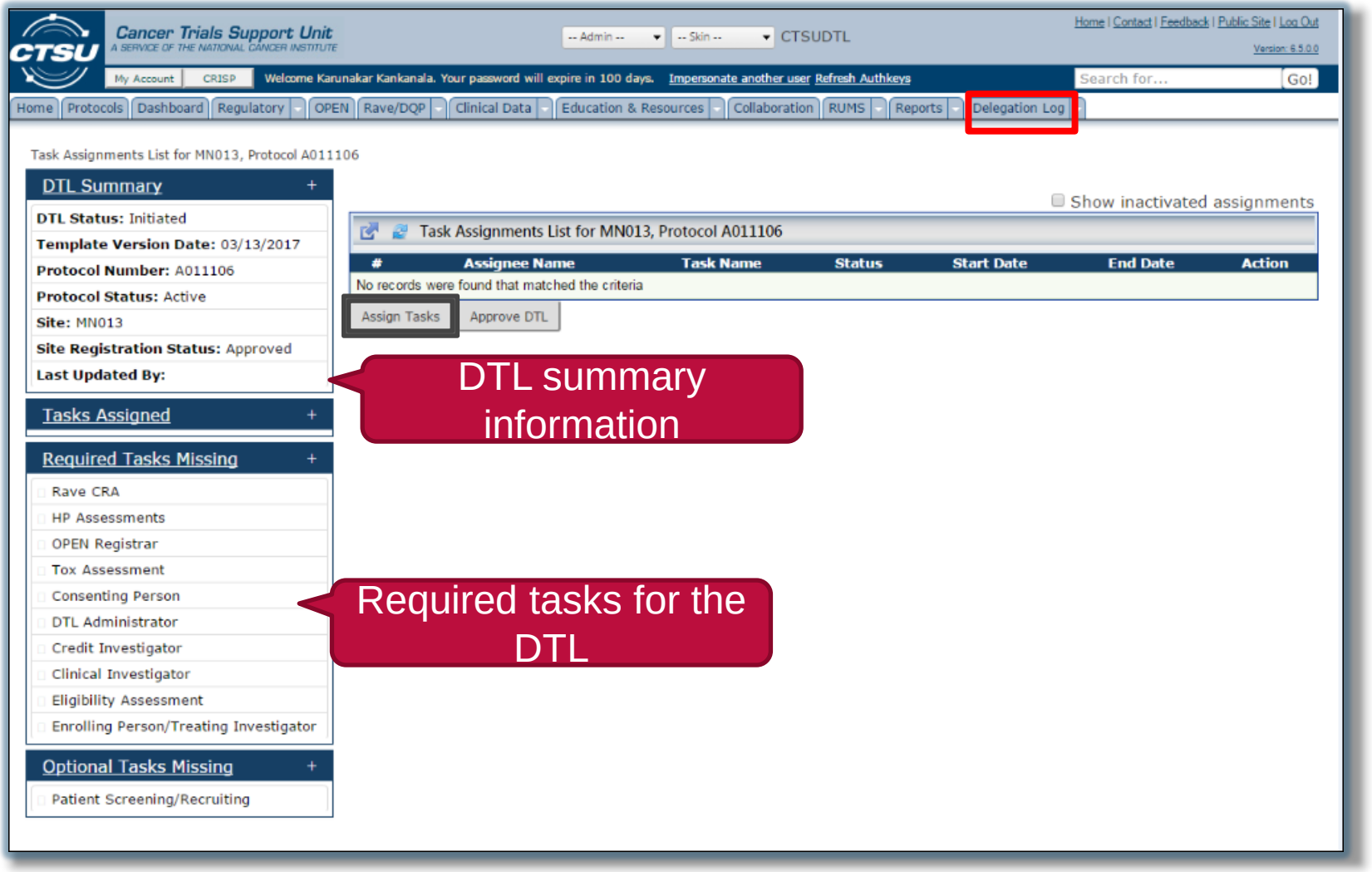
Delegation of Tasks Log (DTL) Development

- CTEP will work with LPOs during LOI / Concept / Protocol development to determine if DTL is needed
- CI [or DTL Administrator (DTLA)] assigns research tasks to registered persons based on qualifications and Registration Type
- CI reviews and signs the protocol and site–specific DTL
- Site/protocol approval process will be determined based on the completion of the DTL and other protocol requirements (PSRs)
- Signed protocol and site–specific DTL controls downstream system access (e.g., OPEN patient enrollment, RAVE data submission) as well as conduct of protocol at clinical site (e.g., eligibility assessment, patient treatment, response assessment)

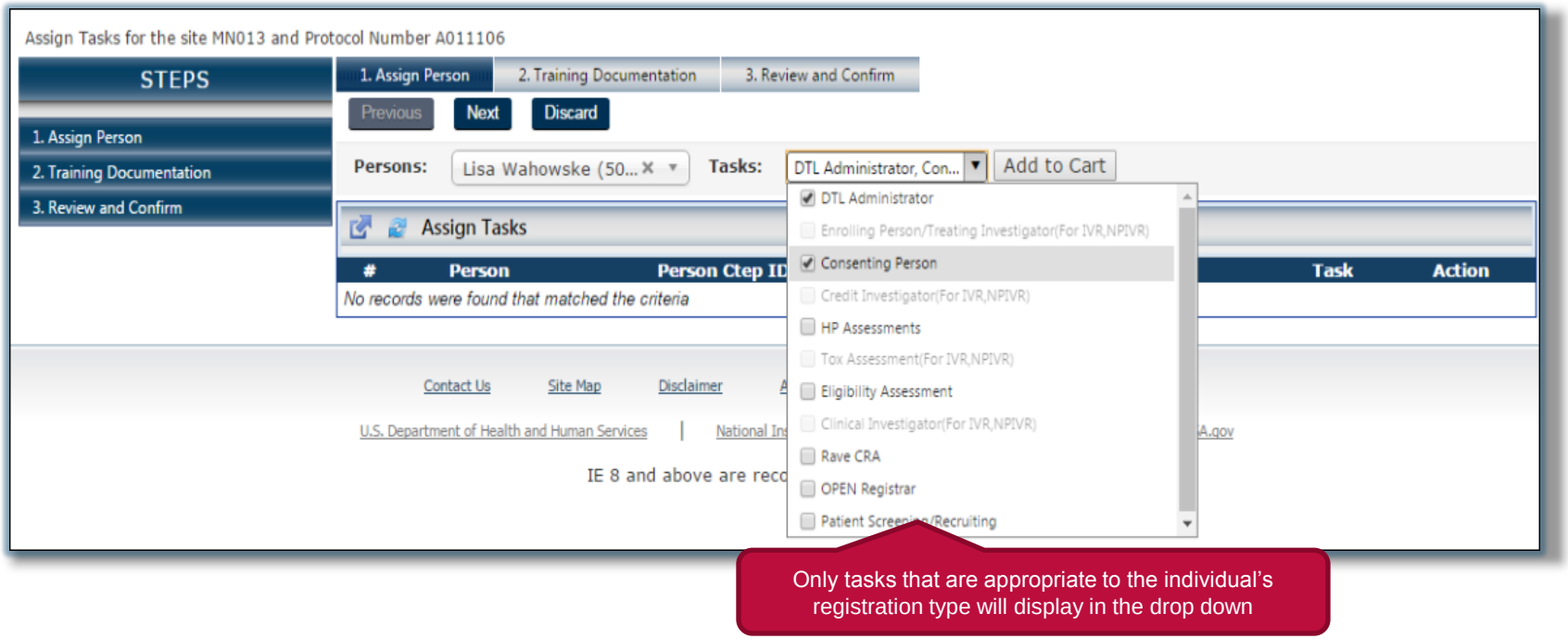
Study Specific DTL

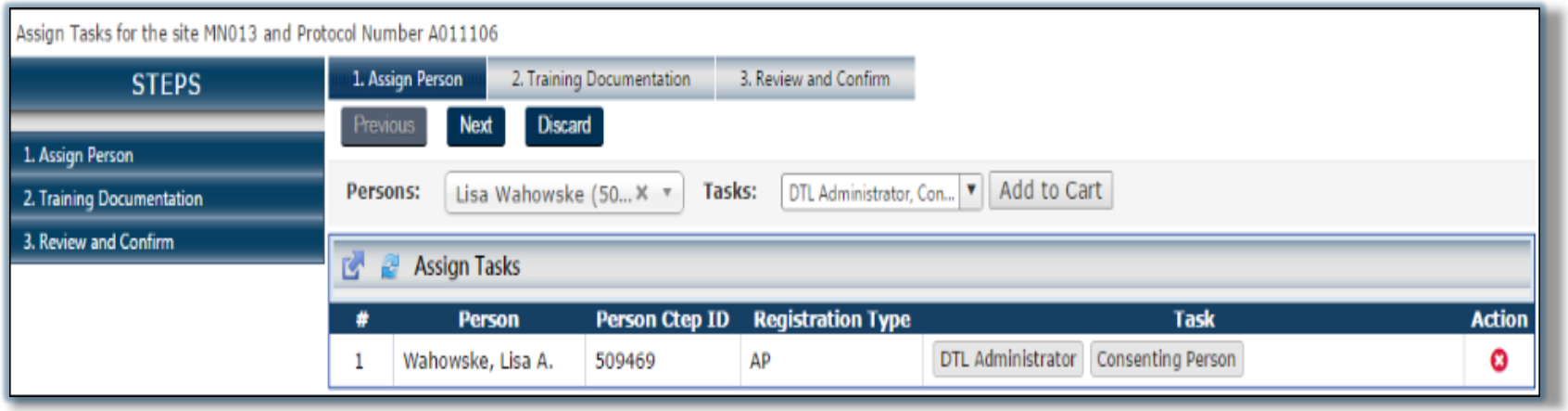


DTL – Assigning Site Staff



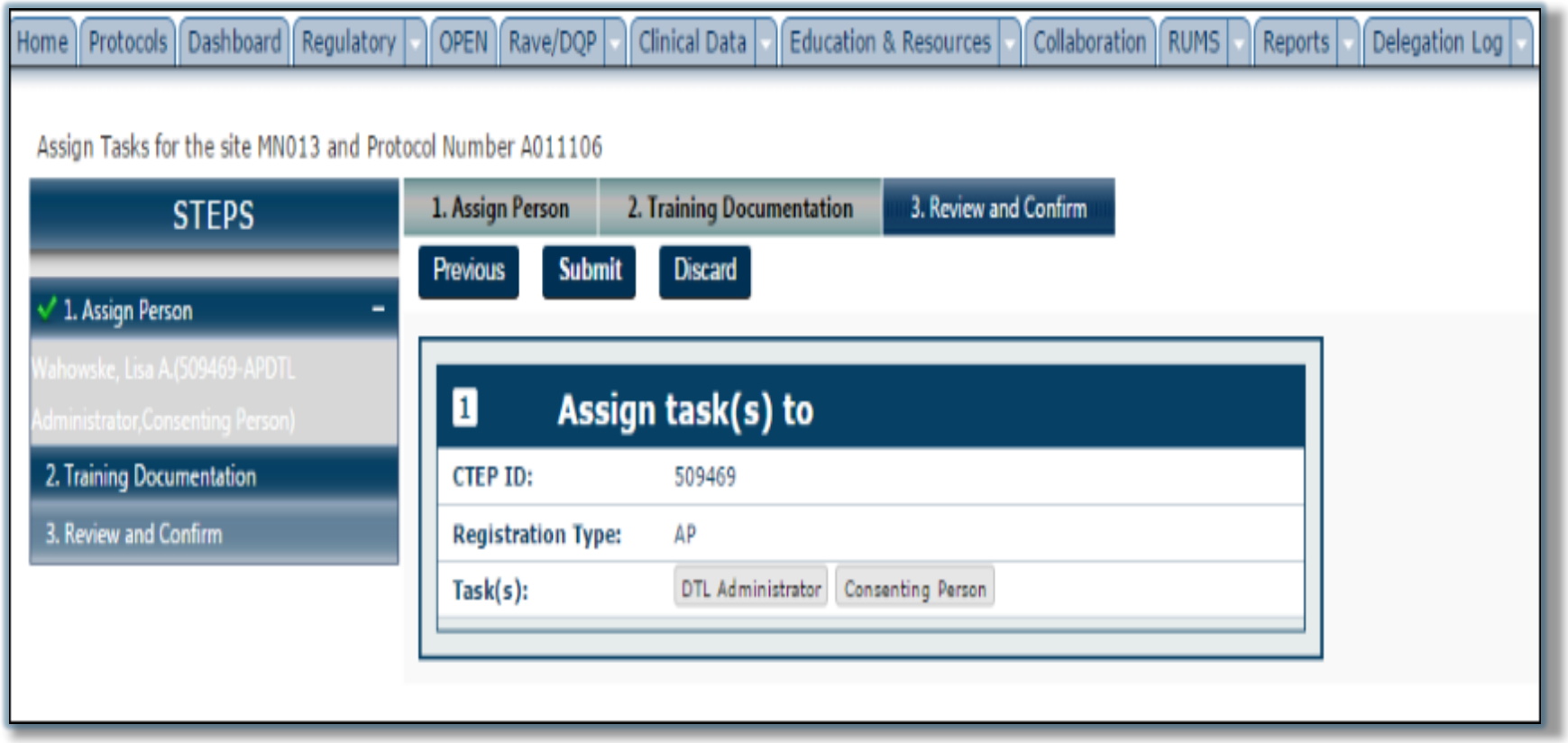
Assigning Site Staff (2)





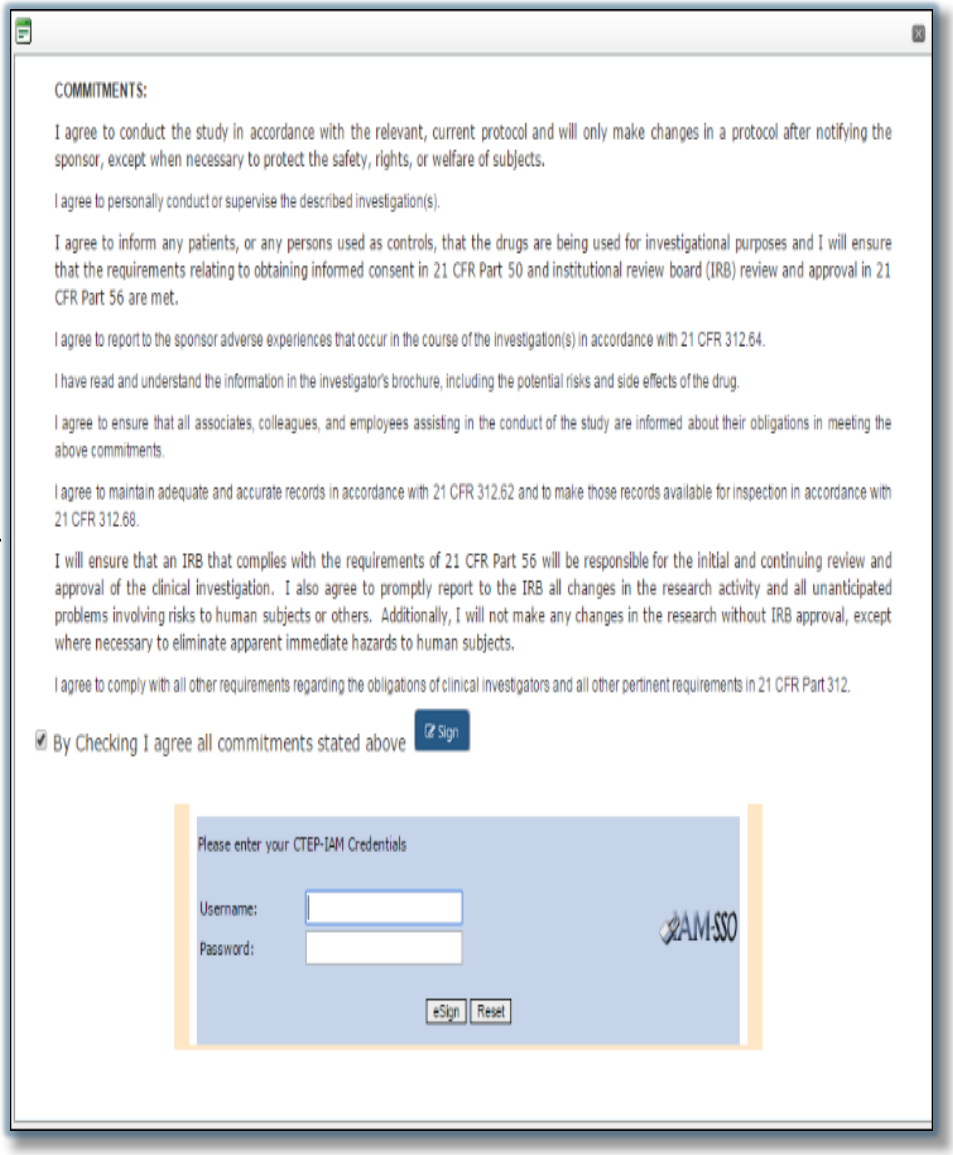
Assigning Site Staff (3)

Confirm Selections and Submit



DLT – CI Approval & Signature

- Requirements
  - All required tasks are active for at least one individual at the site
  - The CI re-signs if a person on a primary or required task changes
  - The CI re-signs annually



Protocol and Site-Specific Registration Packet "FDA packet"

- Produced on demand for audit or inspection purposes
- Contains
  - General Protocol details
  - DTL – current and copies of annual version(s)
  - Study-specific information
    - Protocol CI (all annual 1572s, FDFs and BioSketch, HSP, GCP)
    - Central Labs
    - Sub-investigators (FDFs, BioSketch, HSP, GCP)
    - CIRB/IRB information
    - Study-specific training

Sample NCI Investigator Registration Packet

Protocol Information and Delegation of Tasks Log (DTL)

DTL – 10/21/2015 to 10/20/2016

PROTOCOL INFORMATION		
PROTOCOL TITLE		
A Phase 2, open-ended Multicenter, Safety and Efficacy Study of Z01 agents in Patients With Mutant EGFR Non-small Cell Lung Cancer (NSCLC)		
PHASE		**CTEP DOCUMENT #**
II		P-NCI-0000-100

SITE INFORMATION		
Research Site Name	**Site ID**	**Activation Start Date**
LeHigh Valley Hospital/ Lehigh Valley Health Network	PA132	10/21/2014
Address		
Oncology Research 1210 Building, Cedar Crest Boulevard and I-78, Allentown, PA-18103		

SITE PRINCIPAL INVESTIGATOR INFORMATION		
Person ID	**Name of Principal Investigator**	**Primary Site**
IVR-10001	Graves, Jeffrey	LeHigh Valley Hospital/ Lehigh Valley Health
Address		
Oncology Research 1210 Building, Suite 1000, Cedar Crest Boulevard and I-78, Allentown, PA-18103		

IRB of Record		
IRB #	**IRB Name**	**Address**
IRB00001409	Lehigh Valley Hosp & Hlth Network IRB #1	Allentown PENNSYLVANIA

Laboratory Information		
CLIA #	**Laboratory Name**	**Address**
39D0970241	LEHIGH VALLEY HOSPITAL HLA	200 SOUTH CEDAR CREST BOULEVARD , ALLENTOWN, PA

DELEGATION OF TASKS LOG (DTL)

#	Person ID	SUBINVESTIGATORS	REGISTRATION TYPE / ROLE	RESEARCH TASKS	START DATE / END DATE
1	IVR-10001	Jeffrey Graves	Investigator / Site PI	All Research Tasks	10/21/2014
2	A-30001	Natasha Romanoff	Associate / Site Administrator	DTA	10/21/2014
3	IVR-10002	Diana Prince	Investigator / Physician	EAS, ICD, OIC, CPE, AOD, ASD, ATA, TOA, APR, AEA, AER, PDA, SDC, PEN, LSC, ETR, ASE, MRD, RS	10/21/2014
4	AP-20001	Clark Kent	Associate Plus / Nurse Practitioner	OIC, CPE, AOD, ASD, ATA, TOA, APR, AEA, AER, PDA, LSC, DEA, DSO	10/21/2014 to 04/30/2015
5	AP-20002	Peter Parker	Associate Plus / Nurse Practitioner	OIC, CPE, AOD, ASD, ATA, TOA, APR, AEA, AER, PDA, LSC, DEA, DSO	05/01/2015
6	A-30002	Bruce Banner	Associate / CRA	DAD, DEA	10/21/2014

COMMITMENTS

- I agree to conduct the study(ies) in accordance with the relevant, current protocol(s) and will only make changes in a protocol after notifying the sponsor, except when necessary to protect the safety, rights, or welfare of subjects.
- I agree to personally conduct or supervise the described investigation(s).
- I agree to inform any patients, or any persons used as controls, that the drugs are being used for investigational purposes and I will ensure that the requirements relating to obtaining informed consent in 21 CFR Part 50 and institutional review board (IRB) review and approval in 21 CFR Part 56 are met.
- I agree to report to the sponsor adverse experiences that occur in the course of the investigation(s) in accordance with 21 CFR
- 312.64. I have read and understand the information in the investigator's brochure, including the potential risks and side effects of the drug.
- I agree to ensure that all associates, colleagues, and employees assisting in the conduct of the study(ies) are informed about their obligations in meeting the above commitments.
- I agree to maintain adequate and accurate records in accordance with 21 CFR 312.62 and to make those records available for inspection in accordance with 21 CFR312.68.
- I will ensure that an IRB that complies with the requirements of 21 CFR Part 56 will be responsible for the initial and continuing review and approval of the clinical investigation. I also agree to promptly report to the IRB all changes in the research activity and all unanticipated problems involving risks to human subjects or others. Additionally, I will not make any changes in the research without IRB approval, except where necessary to eliminate apparent immediate hazards to human subjects.
- I agree to comply with all other requirements regarding the obligations of clinical investigators and all other pertinent requirements in 21 CFR Part 312.

SIGNATURE

SIGNATURE Jeffrey Graves	DATE 10/21/2015	PRINTED NAME Jeffrey Graves

I have acknowledged and agree that my electronic signature is the legally binding equivalent to my handwritten signature. Whenever I execute an electronic signature, it has the same validity and meaning as my handwritten signature. I will not, at any time in the future, repudiate the meaning of my electronic signature or claim that my electronic signature is not legally binding.

Research Tasks Legend					
DTA	Delegation of Tasks Authority	EAS	Eligibility assessment	ICD	IC discussion
OIC	Obtain informed consent	CPE	Conduct Physical Exams	AOD	Agent Ordering Designee
ASD	Agent Shipping Designee	ATA	Administration of test article	TOA	Toxicity Assessment
APR	Agent Prescription	AEA	AE assessment	AER	AE reporting
PDA	Perform drug accountability	SDC	Source Document Completion	PEN	Patient Enrollment
LSC	Laboratory Specimen Collection/Shipping	ETR	Evaluate study-related test results	ASE	Assessment of primary study endpoints
MRD	Update/maintain regulatory docs	DEA	Data Entry/Access	DSO	Data Sign-off
RS	Regulatory submissions	DAD	Delegation of Tasks Administration		

RCR and DTL Launch Support

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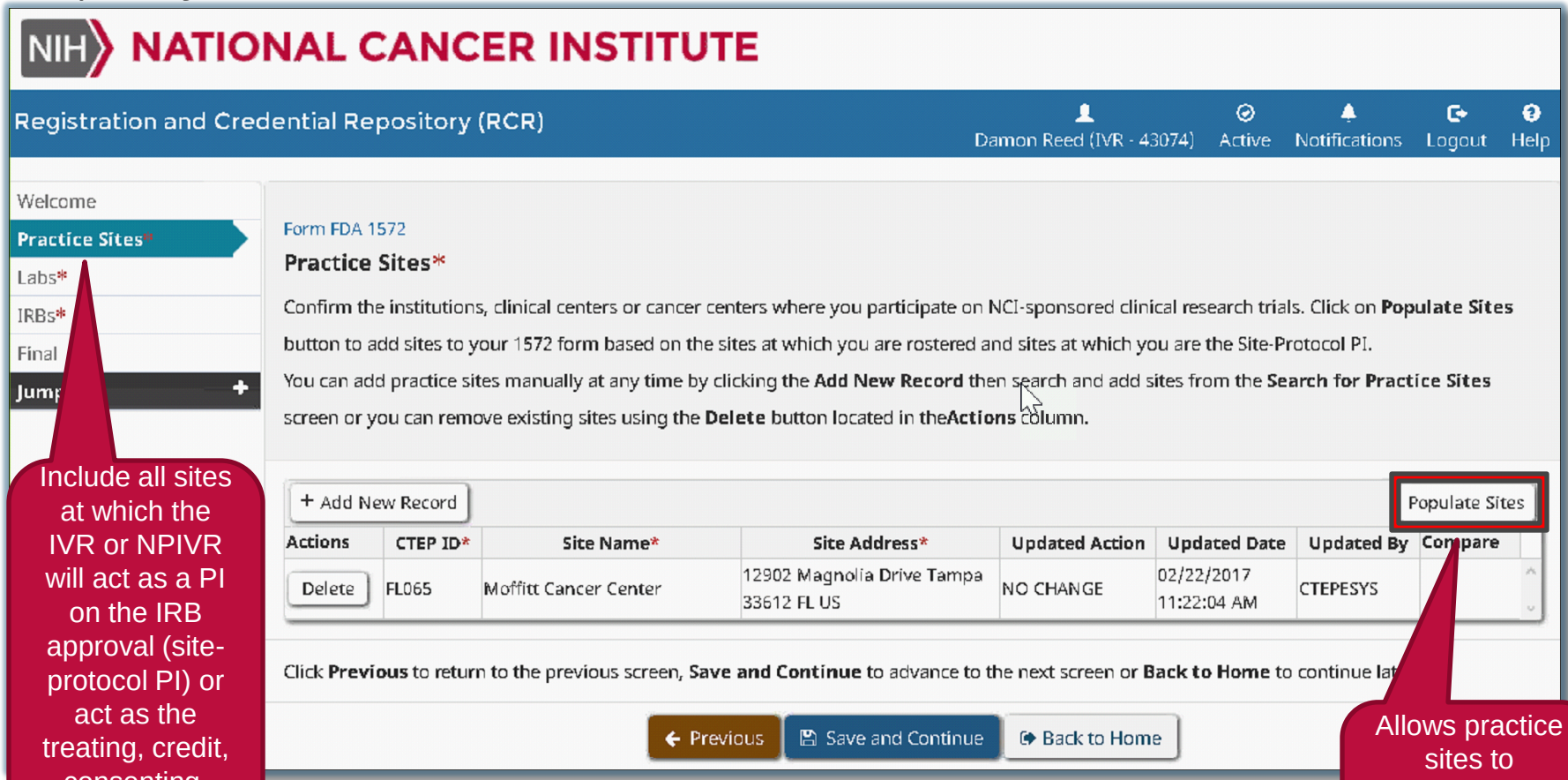
Easing the Burden for First Time RCR Registration

- Generic Features
  - Registration Coordinator (RC) assignments
  - RC templates for 1572 and Shipping entries
  - Warning and error indicators for accurate registration information
  - Instructional message boards and notifications
  - Workflow-driven
  - Electronic signature on all forms using IAM credentials

FDA Form 1572 – Site Information

Required for IVRs & NPIVRs

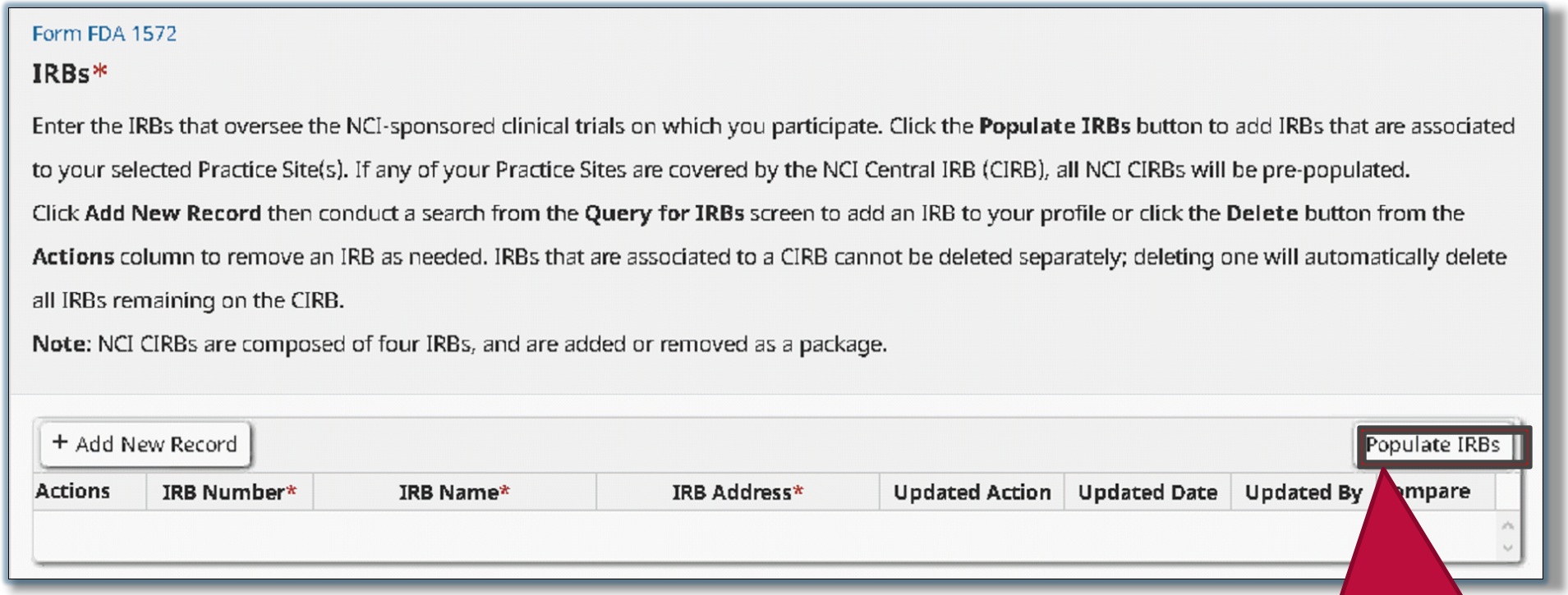


Include all sites at which the IVR or NPIVR will act as a PI on the IRB approval (site-protocol PI) or act as the treating, credit, consenting, drug shipment or 'transfer to' IVR in OPEN

Allows practice sites to populate from RSS roster and site registration data

FDA Form 1572 – IRB Information

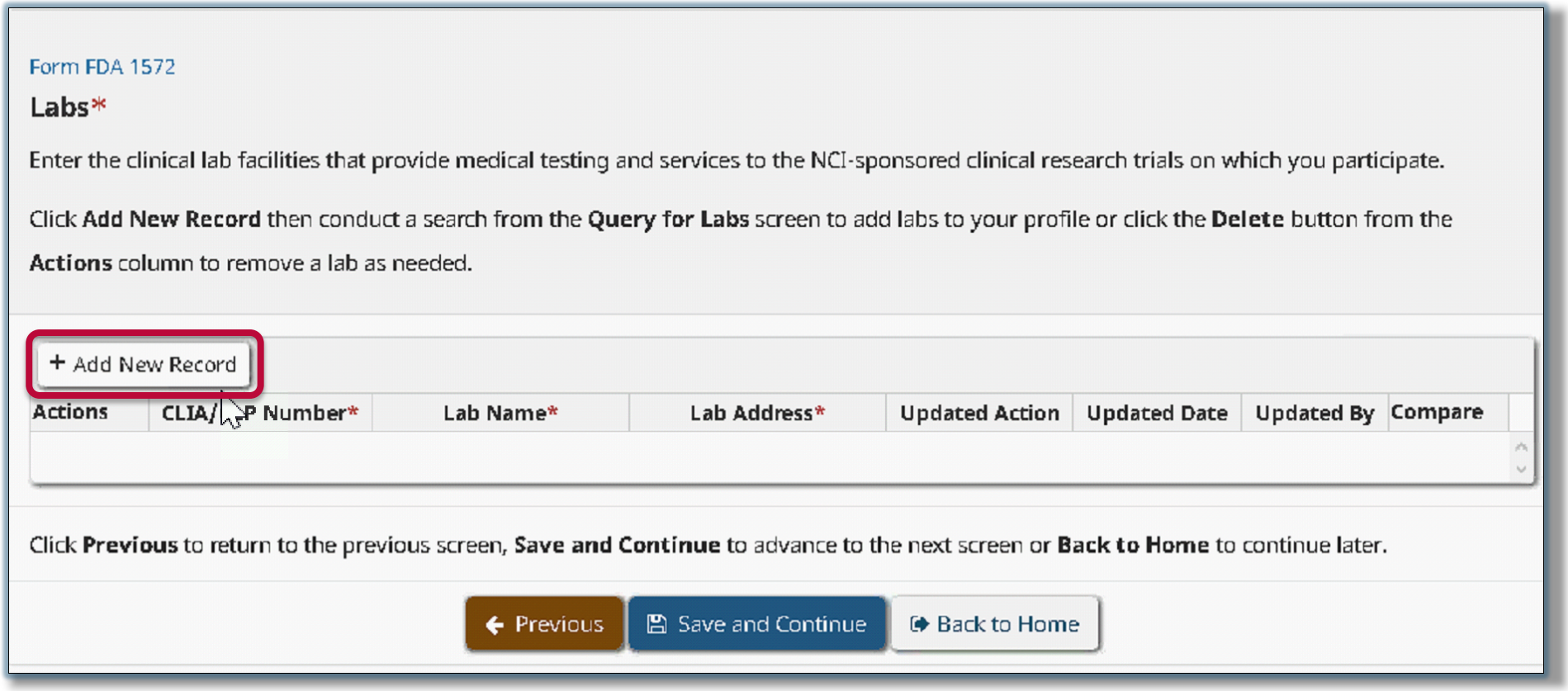
Required for IVRs & NPIVRs



Populates all IRBs associated with the IVR or NPIVR in RSS based upon site affiliations; also populates all 4 CIRB IRB numbers if the site is on the CIRB roster

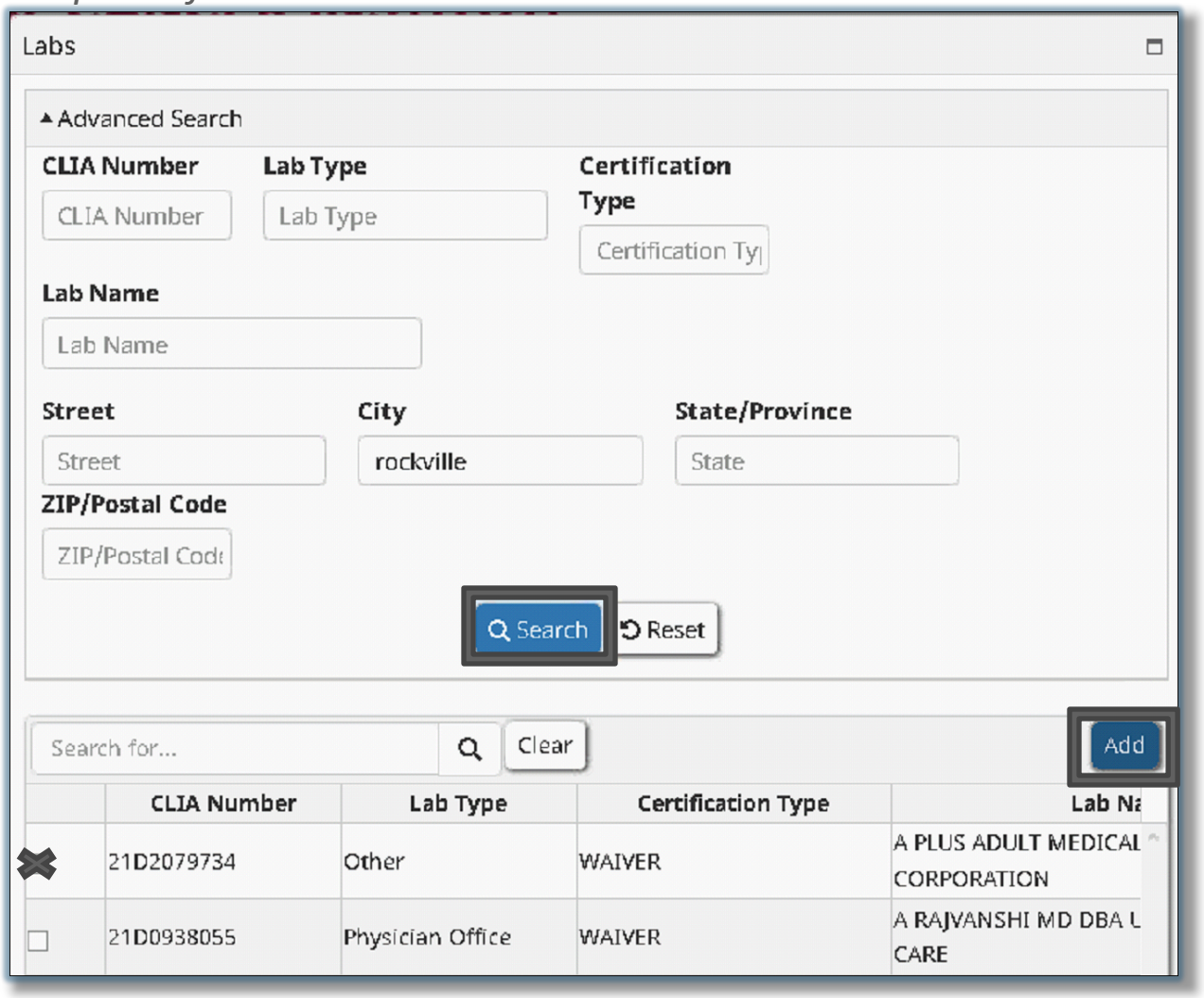
FDA Form 1572– Lab Information(1)

Required for IVRs & NPIVRs



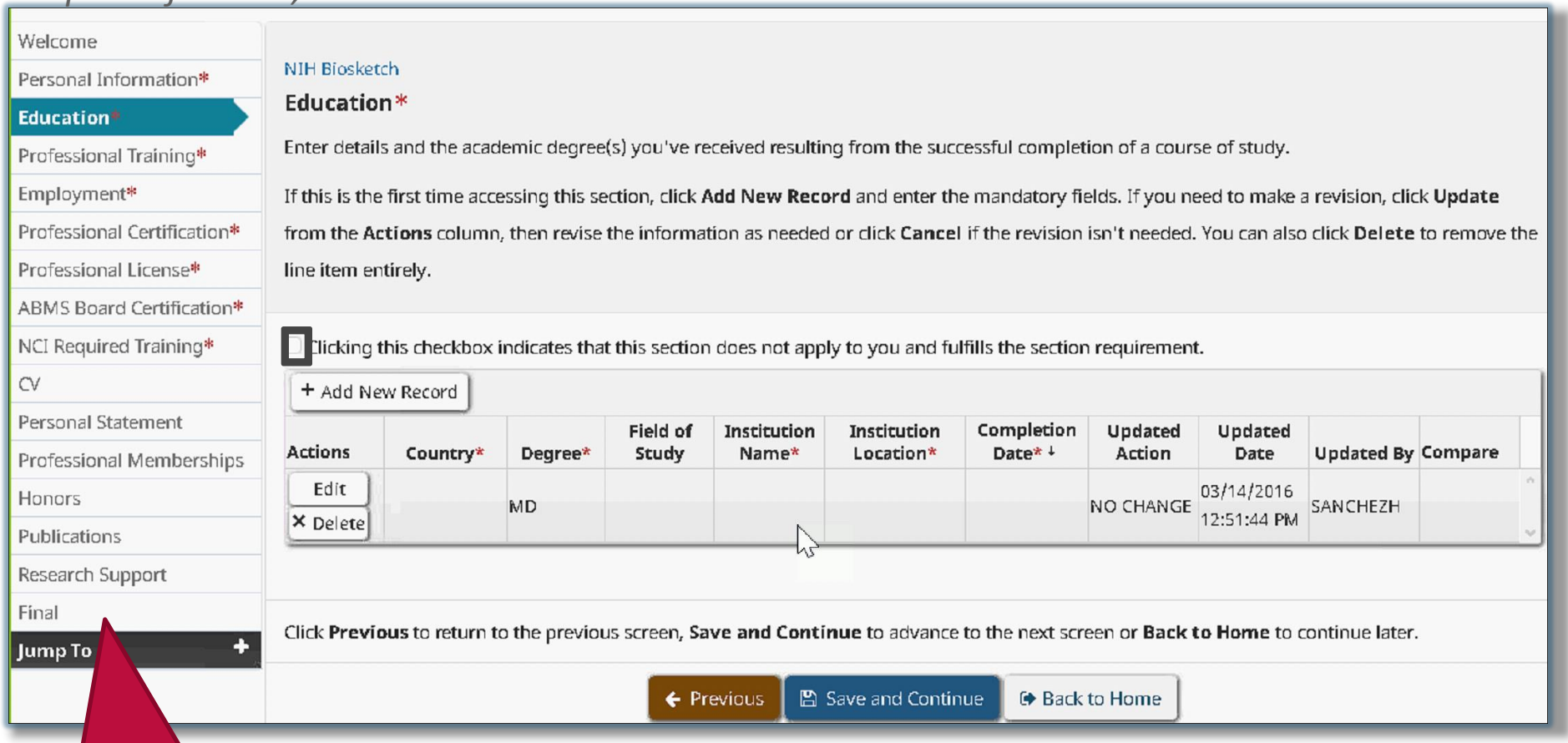
FDA Form 1572 – Lab Information (2)

Required for IVRs & NPIVRs



Biosketch (1)

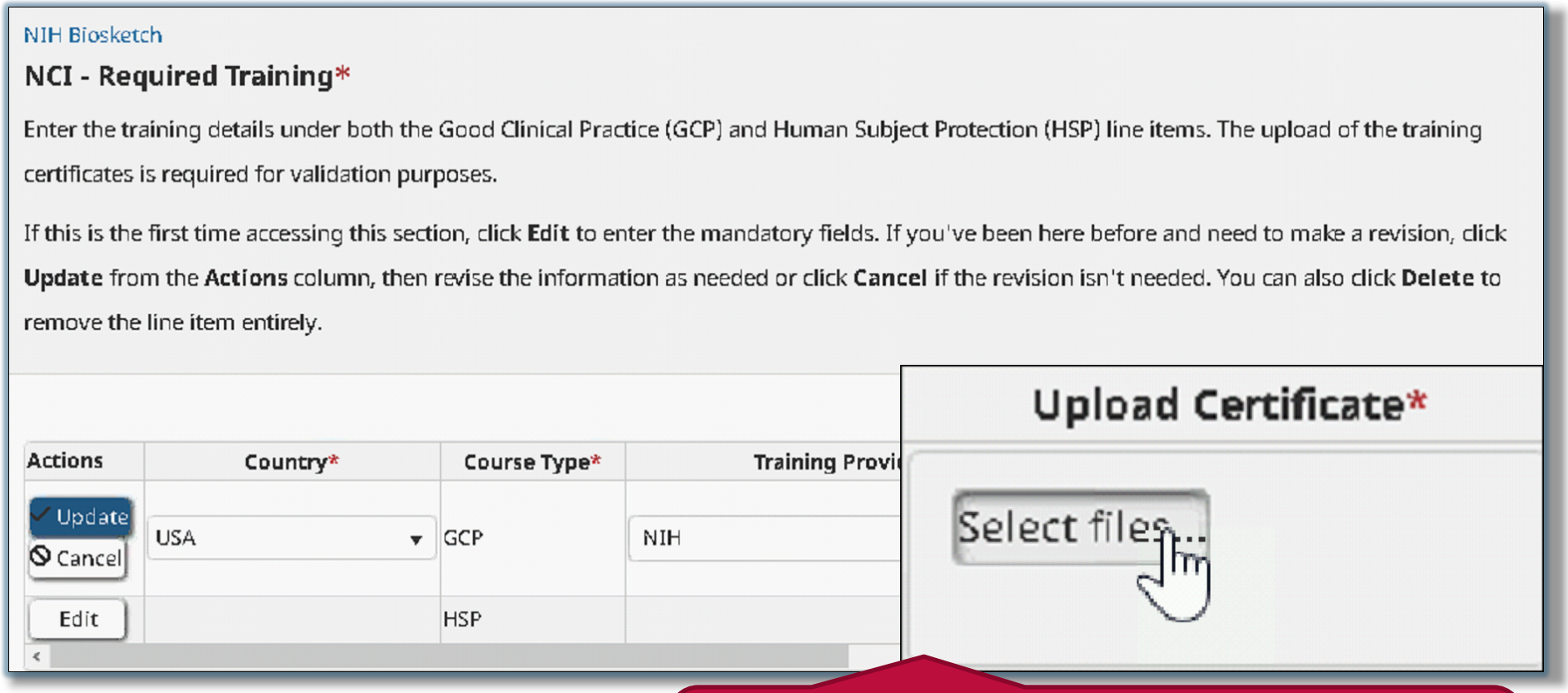
Required for IVRs, NPIVRs & APs



Complete each section that applies to you or indicate items that don't apply to you by selecting the checkbox

Biosketch (2)

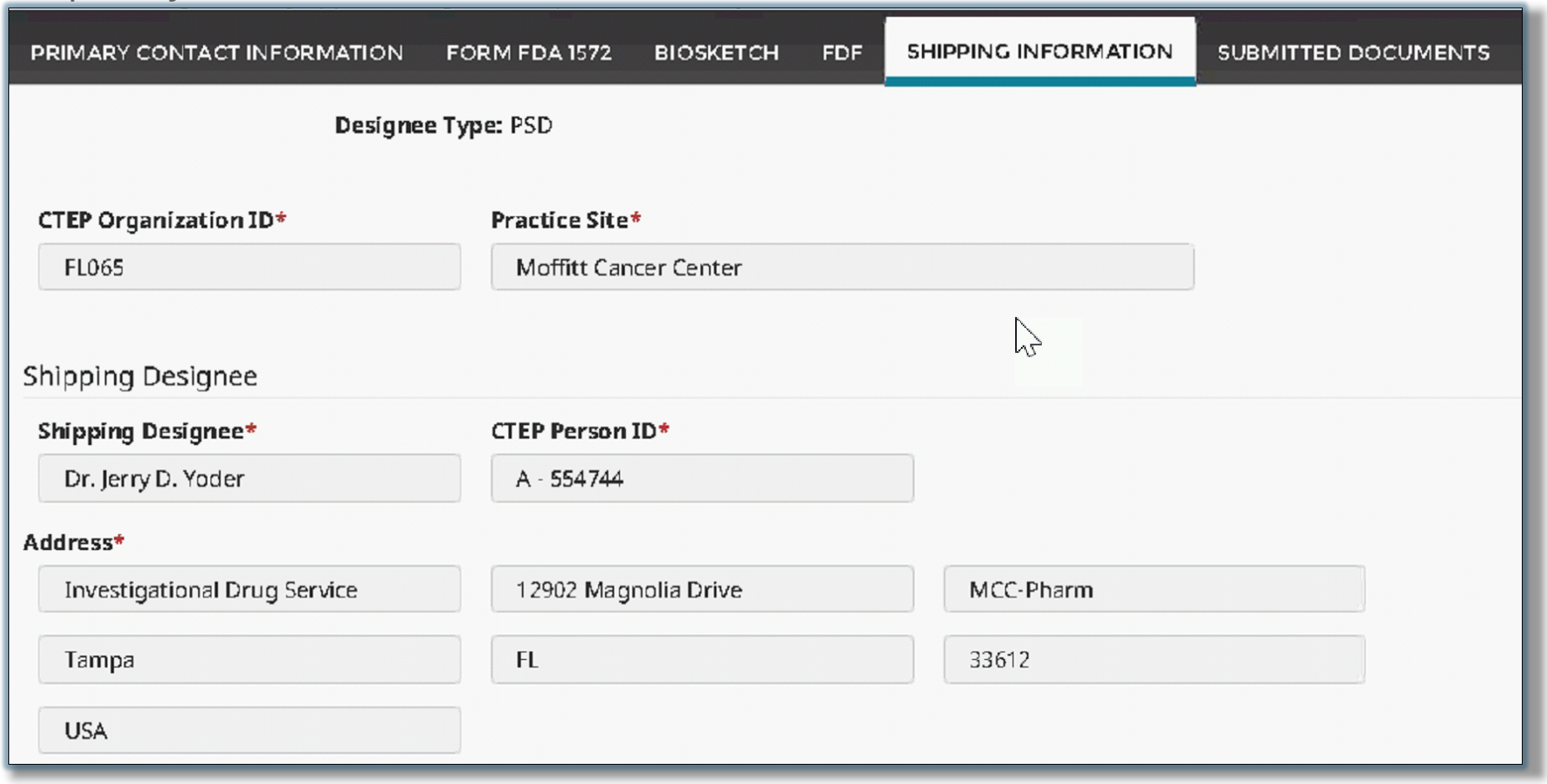
Required for IVRs, NPIVRs & APs



Upload GCP and HSP training documents:
HSP - no expiration for NIH training, but if using another training course with an expiration date that date will apply
GCP – expiration date as stated on the certificate or in 3 years from course date if not stated on the certificate

Shipping Information

Required for IVRs



Easing the Burden for First Time Registration

- Financial Disclosure Form
  - Confidential information – will not be able to migrate existing data
  - Four Yes/No questions for potential pharma conflicts
  - Ability to search and add potential pharma conflicts for any question answered as “Yes”

RCR Production Launch

- Rolling implementation based on date of registration
- “Relaxed Mode” for business rules until person re-registers
  - **Rostering of Investigators:** No verification that the investigator lists the sites on their 1572 until re-registration
  - **IRB Verification:** No verification of IRB numbers for site PI or enrolling PI until re-registration

- All RCR rules enforced **after** re-registration.
  - **Rostering of Investigators:** an investigator can only be claimed at a site if it is in the Investigator’s 1572 as a practice site.
  - **Site Registrations:** site PI’s 1572 IRB must match site’s IRB approval
  - **OPEN Enrollments:** investigator’s 1572 IRB must match site’s IRB approval

Easing Burden for DTL Set-up

- Collaborate on creation of study-specific template with LPO
  - During protocol development, but can follow separate timelines
  - Standardized tasks list
- Allow administrative changes by DTLA
- Relaxation of rules for first year while investigator / sub investigator data is compiled in RCR
- Development of site level templates
- Ability to “copy” existing DTLs

DTL Production Launch

- Pilot with a Registration Trial from each NCTN before expansion
  - Studies will be determined by CTEP and LPO
  - LPOs need to have an approved DTL template before the study can be activated.
    - Grace period for implementation of DTL to ongoing protocols

Application Release Schedule

- July 31st, 2017 – RCR released
- August 2017 – DTL released to LPOs
- 3rd Quarter 2018 – Re-registration cycle complete

RCR: What Can I Do Now?

- Make sure your IVRs have an IAM account (very few do)
- Begin creating a “cheat sheet” for your IVRs and NPIVRs
  - Practice Sites (CTEP site codes) >>> check RUMS
  - Labs (CLIA lab numbers) >>> check with hospital lab manager
  - IRBs (OHRP IRB numbers) >>> check with your local IRB
- Begin collecting HSP and GCP training documentation including course provider, course title, completion date, expiration date, and an e-copy of the training certificate for your IVRs, NPIVRs, and APs
- Setup a “Registration Coordinator(s)” for your site(s)
- Establish a “Primary Shipping Designee(s)” for your site(s)

Questions?

For further questions or feedback, please send email to:

< NCIPMBRCRDTL@mail.nih.gov >

To setup a Registration Coordinator (RC):

Send an email to < CTEPRegHelp@ctep.nci.nih.gov >
with Subject: Make Me a Registration Coordinator

- include CTEP person ID, full name, and CTEP site code for the proposed RC

To setup a Primary Shipping Designee (PSD):

Send an email to < CTEPRegHelp@ctep.nci.nih.gov >
with Subject: Establishing a Primacy Shipping Designee
for < CTEP Site Code / CTEP Site Name >

- include CTEP person ID and full name for the proposed PSD (note: pharmacist with pharmacy address strongly preferred)

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