

**University of California, San Francisco
Helen Diller Family Comprehensive Cancer Center
Policy and Procedure**

PRMS Amendment Review Policy

PRMS Procedure for Review of Protocol
Amendments by the Protocol Review Committee

Purpose

Per the CCSG Guidelines, it is particularly important for Centers involved in clinical research to establish a mechanism for assuring adequate internal oversight of the conduct of all cancer clinical trials in the institution or institutions that formally comprise the Center. The focus of the Protocol Review and Monitoring System (PRMS) is on *scientific merit, priorities and progress* of the clinical research in the Center. At UCSF PRMS functions are carried out by the Program Site Committees and the Protocol Review Committee (PRC). All protocols initially requiring PRC approval must have all amendments reviewed by the PRC.

The purpose of this policy is to document the process by which all protocol amendments must be reviewed by the Protocol Review Committee.

Procedures

What Needs to be Reviewed

Once a protocol is approved by the PRC, all future changes to that protocol are termed amendments and must be reviewed by the PRC. Amendments are any changes made to the protocol version which was originally approved by the PRC over the life of the clinical trial, regardless of the nature of the change (e.g., editorial, administrative, scientific, etc.). Amendment reviews are carried out by the PRC Administrator and brought to the PRC Chair or Vice-Chair if the amendment may affect the initial scientific aspects of the study (i.e., the scientific intent of the study, study design, patient risk, or human subject protection). Studies that have significant amendments are referred by the PRC Chair or Vice-Chair for PRC full committee review. All protocol amendments must be approved by the institutional IRB (the Committee on Human Research, or CHR) prior to implementation.

Protocols exempt from PRC review do not require amendment review by the PRC.

Submission Requirements

See **PRMS Amendment Submission Policy** for submission requirements.

Review Process

Submissions are reviewed as a whole. The review outcome will apply to all documents submitted, and to all changes contained within the Summary of Changes and unmarked protocol document.

The PRC Administrator will review each amendment submission. If the changes are deemed administrative and do not encompass any of the bullet points below (i.e., they do not affect the scientific intent of the study or study design), then the PRC Administrator can approve the amendment. If the changes are deemed to encompass any of the bullet points below, then the PRC Administrator will forward the amendment to the PRC Chair or Vice-Chair for review. If the Chair is the Principal Investigator (PI), then the amendment will be given to the Vice-Chair or, in the event of a conflict with both the PRC Chair and Vice-Chair, to a designated Alternate Chair. The PRC Chair, Vice-Chair or Alternate Chair has the prerogative to refer any amendment for PRC full committee review.

Amendments that require review by the PRC Chair, Vice-Chair or Alternate Chair:

- change in dose
- change to response criteria
- addition of a study site to a multi-center study where UCSF is the coordinating center
- change from institutional single-center study to multi-center study where UCSF is the coordinating center.

Amendments that require review by the PRC Chair, Vice-Chair or Alternate Chair which may trigger review by the full committee:

- change in study design (including addition of follow-up phase)
- other treatment changes (except prophylaxis regimens, e.g., prophylaxis for infections in leukemia and transplant patients)
- change in sample size
- change in stopping rules
- change in statistical plan.

Expedited review of amendments by the PRC Chair, Vice-Chair or Alternate Chair are documented via a completed amendment review form. Review of amendments going to full committee are documented via the standard full committee review forms. All amendment reviews (by either the PRC Administrator, PRC Chair, Vice-Chair or Alternate Chair) are documented in OnCore (the Cancer Center's secure electronic web-based database) and issued via electronic notification from OnCore.

Approval Process

After review by either the PRC Administrator, PRC Chair, Vice-Chair or Alternate Chair, the PRC Administrator will either prepare a review outcome memo (for Contingent Approval) or an approval notification using OnCore, or prepare the submission for full committee review, depending on the outcome.

A review outcome memo (for Contingent Approval) will include a discussion of which revisions were not acceptable and why, and may contain suggestions on how the PI can make those revisions acceptable. The review outcome memo will be issued to the PI, Protocol Project Manager (PPM), and the submitter. Approval will not be granted until all of the concerns are met. The PI's response to Contingent Approval must follow the criteria outlined in **PRMS Amendment Submission Policy**, but need only include those items that were revised in response to the Contingent Approval status. The exception to this is that all Contingent Approval response submissions must include a separate document that discusses each concern point-by-point and explains how each was addressed.


If approved, amendment approval notification will be issued to the PI, Protocol Project Manager (PPM), and the submitter via OnCore. If there are suggestions provided with the amendment approval notification, they are recommendations only. The PI may choose to respond by submitting a separate amendment application, but this is not required.

Alternate Procedures

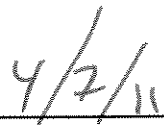
There are no alternate procedures to this policy.

Policy Approval

This policy document was approved by the following personnel on the following dates:



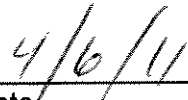
Eric Small, MD
Director, Investigational Trials Resource



Date



Judith Luce, MD
Chair, Protocol Review Committee



Date