

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

**PRMS Amendment Submission Policy**

PRMS Procedure for Submitting Institutional Protocol  
Amendments to 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 Protocol Review Committee (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 submitted to the Protocol Review Committee for review. The portion of this policy pertaining to institutional (investigator-initiated) clinical trials is modeled after the CTEP Amendment Request Submission Policy, Version date May 14, 2004; it has been modified to meet institutional standards.

**Procedures**

What Needs to be Submitted

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.).

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

## Submission Requirements

### **Submission Requirements for Industry and Cooperative Group Protocols**

All industry and cooperative group protocol amendment applications must contain the following documents:

- A PRC Amendment Submission Form signed by the Principal Investigator (PI) and the Site Committee Chair or Co-Chair (required on all protocol amendment submissions).
- The Summary of Changes provided by the sponsor, identifying the changes made to the protocol document.
- An unmarked copy of the revised protocol document which accurately reflects all changes detailed in the Summary of Changes document. The revised protocol document must contain all appendices listed in the Table of Contents, regardless of whether or not they were revised. Exception: if case report forms (CRFs) are identified in the Table of Contents those CRFs do not need to be included, unless the amendment affects the CRFs.

### **Submission Requirements for Investigator-Initiated Protocols from Outside Institutions**

All protocol amendment applications for multicenter investigator-initiated trials for which UCSF is a participating institution and not the coordinating center must contain the following documents:

- A PRC Amendment Submission Form signed by the Principal Investigator (PI) and the Site Committee Chair or Co-Chair (required on all protocol amendment submissions).
- The Summary of Changes provided by the outside institution (the sponsor-investigator), identifying the changes made to the protocol document. If the outside institution does not supply a Summary of Changes, the UCSF Helen Diller Family Comprehensive Cancer Center template must be used (see **Submission Requirements for UCSF Institutional (Investigator-Initiated) Protocols** below).
- An unmarked copy of the revised protocol document which accurately reflects all changes detailed in the Summary of Changes document. The revised protocol document must contain all appendices listed in the Table of Contents, regardless of whether or not they were revised. Exception: if case report forms (CRFs) are identified in the Table of Contents those CRFs do not need to be included, unless the amendment affects the CRFs.

### **Submission Requirements for UCSF Institutional (Investigator-Initiated) Protocols**

All protocol amendment applications for UCSF institutional (investigator-initiated) trials (those created by a UCSF investigator) must contain the following documents:

- A PRC Amendment Submission Form signed by the Principal Investigator (PI) and the Site Committee Chair or Co-Chair (required on all protocol amendment submissions).
- A Summary of Changes which identifies each change made to the protocol document. Each change must be described in a point-by-point format which identifies the page number, section number, specific changes, and a brief rationale for the change where appropriate (e.g., "Page 5, Section 1.3, original text = 'abc', replacement text = 'xyz', rationale for change). Page numbers should reflect the clean unmarked copy of the protocol document. (See suggested template: **PRC Amendment Application - Summary of Changes**)

The Summary of Changes must include the current protocol title, protocol number, and the revised version date and version number (see protocol document discussion below).

- An unmarked copy of the revised protocol document which accurately reflects all changes detailed in the Summary of Changes document. The revised protocol document must contain all of the following:
  - All appendices listed in the Table of Contents, regardless of whether or not they were revised. Exception: if case report forms (CRFs) are identified in the Table of Contents those CRFs do not need to be included, unless the amendment affects the CRFs.
  - The version date must be revised. The revised version date will be a single date on which all changes were made to the protocol document.

Note: There is no requirement for the dating of individual editorial or administrative updates within the body of the protocol. Rather, it will be the policy of this institution that all changes made to a specific protocol (i.e., all changes listed on the Summary of Changes document) are understood to have been made at the same time, that is, on the same, single date reflected in the version date. Any changes occurring after that timepoint need to be included in another, future, amendment submission.

- The protocol document title page must include a history of all version numbers and version dates, beginning with the first official version number and date to have undergone any formal regulatory review (e.g.: Final Version = Version Number 1.0; Amendment Number 1 = Version Number 2.0, etc.). See **Sample Protocol Facepage** for an example.
- The footer on each page must reflect the revised version date (and version number if applicable).
- Not required: Use of a version number in conjunction with the required version date is highly recommended, but not required. However, if not

currently using version numbers on a previously approved protocol, do not begin to use version numbers with an amendment. If version numbers have been in use from the inception of the project, then the version number must be revised with each amendment. The recommended method of version numbering will be to use 1.0 as the initial version number (the approved 'Final' version, i.e., the first non-draft version). Using this recommended method, all amendments would therefore have a version number greater than 1.0. Suggested method is to use whole numbers for major amendments (e.g., 2.0, 3.0, etc.), and decimal numbers for minor amendments (e.g., 1.1, 1.2, etc.). Should version numbers be used, the method selected must be used consistently throughout the life of the protocol.

- If the amendment is in response to a request for revision from a collaborator, the FDA, CHR, or any other regulatory body, a copy of that request for revision document should be included.

#### How to Submit

All amendments must be submitted within OnCore (the Cancer Center's secure electronic web-based database) per the directions found in the PRC (ePRMS) User Manual (see [http://portal.hdfccc.ucsf.edu/OnCore/wiki/Wiki%20Pages/Protocol%20Review%20Committee%20\(PRC\)%20in%20OnCore.aspx](http://portal.hdfccc.ucsf.edu/OnCore/wiki/Wiki%20Pages/Protocol%20Review%20Committee%20(PRC)%20in%20OnCore.aspx)).

### Incomplete Applications

Incomplete applications will not be reviewed.

### Responding to Contingent Approval of an Amendment

The PI's response to Contingent approval of an amendment application must follow the criteria outlined in Submission Requirements above, but need only include those documents that were revised in response to the Contingent approval status. The only 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. This document should be modeled on the **PRC Amendment Application - Summary of Changes** template. I.e., it should identify the page number, section number, specific changes, and a brief rationale for the change where appropriate (e.g., "Page 5, Section 1.3, original text = 'abc', replacement text = 'xyz', rationale for change). If a requested change is not made, the summary of changes should provide a rationale for not doing so. Page numbers should reflect the clean unmarked copy of the protocol document.

### Withdrawal Procedure


An amendment may be withdrawn by the PI or designee provided it is still in the review process. The request for withdrawal must be made in writing. Once an amendment has been approved by the PRC it cannot be withdrawn. Should the PI wish to reverse an amendment once it is approved by PRC, the PI must submit a new amendment application as in Submission Requirements above, reversing the amended items.

### **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:

  
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Eric Small, MD  
Director, Investigational Trials Resource

3/11/11  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Judith Luce, MD  
Chair, Protocol Review Committee

3/30/11  
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Date