

Title: Continuing Review of Study Protocols

SOP Code: SOP 10/V1 dated 18th February 2017

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1. Purpose

The purpose of this Standard Operating Procedure is to describe how continuing reviews of previously approved protocols are managed by the Institutional Ethics Committee (IEC).

The purpose of the continuing review is to monitor the progress of the entire study, not just the changes in it, to ensure continuous protection of the rights and welfare of research participants.

2. Scope

This SOP applies to conducting any continuing review of study protocols involving research participants at intervals appropriate to the degree of risk. All the projects approved by the Institutional Ethics Committee will be reviewed at least once a year. Depending upon the degree of risk to the participants, the nature of the studies, the vulnerability of the study participants and duration of the study, the IEC may choose to review or monitor the protocols more frequently.

3. Responsibility

It is the responsibility of the IEC Secretariat to remind the IEC and the principal investigators regarding study protocols that should be continuously reviewed. All the approved protocols will be reviewed annually (at least once a year). The Chairperson is responsible for determining the date of continuing review if the project will be reviewed more frequently in the year. This decision is taken during the IEC meeting wherein the project is finally approved or can be taken subsequently based on the SAE reports, monitoring reports, adequacy documentation procedures followed by the investigators or new safety data received.

The IEC is responsible for reviewing the progress made in the protocol, the occurrence of unexpected events or problems, and the rate of accrual of participants.

The IEC has the same options for decision making on a continuing review package as for an initial review package. The decision is made as approval to continue the study; approval with recommendations; or disapproval.

4. Flow chart

No.	Activity	Responsibility
1	Determine the date of continuing review	IEC Secretariat and Chairperson
2	Notify the Principal Investigator or study team	IEC Secretariat
3	Manage continuing review package upon receipt	IEC Secretariat
4	Notify the members of the IEC	IEC Secretariat
5	Prepare meeting agenda	IEC Secretariat

6	Review of Continuing review report	IEC Secretariat, Members, and Chairperson
7	Store original documents	IEC Secretariat
8	Communicate the IEC decision to the Principal Investigator	IEC Secretariat

5. Detailed instructions

5.1 Determining the date of continuing review

- The Administrative Officer will look through the document archives/master chart of projects approved by the IEC for the due date of continuing reviews.
- The Secretariat will plan for continuing review of annual progress reports to be reviewed as close as possible to the due date or the anniversary of the effective date (date of original approval) of the protocol.

5.2 Notifying the Principal Investigator or the study team

- If the Principal Investigator fails to submit the Continuing review report within one month of the due date (i.e. 11th months from the date of approval, unless specified otherwise), the IEC secretariat will send a reminder as per the format mentioned in AX 01/SOP 10/V4 within 7 working days of this due date. If there is no response within 15 days after the date of reminder, the IEC secretariat will put up the matter for discussion at the forthcoming full board meeting for appropriate action which may consist of but not limited to
 - a) A letter of reprimanding the Investigator.
 - b) Not reviewing future projects from the PI for a specified period of time.
 - c) A letter asking the Investigator to put recruitment of new participants on hold.

5.3 Managing the continuing review package upon receipt.

- The Secretariat will receive a package (soft and hard copy) submitted by the Study Team of continuing review for each approved protocol. Only one set (soft and hard copy) of continuing review report shall be submitted by the Principal Investigator to the IEC as per the format Continuing Review Application Form (AX 02/SOP 10/V1).

5.3.1 Verifying the contents of the package

- The Secretariat will make sure that the contents of the package include the following documents:
 - Continuing Review Application Form (AX 02/SOP 10/V1)
 - The Continuing Review Application Form duly filled with an explanation for any “yes” (ticked on the Continuing Review Application Form (AX 02/SOP 10/V1) answers on the application form and a discussion of scientific development, either through the conduct of this study or similar research that may alter risks to research participants. The changes in the selection criteria of participants, protocol/Informed consent Document amendments, changes in the study team,

any unexpected complications etc. have to be discussed in the attached narrative.

- The Secretariat will check for complete information and for the presence of the required signatures of the Principal Investigator in the Continuing Review Application Form (AX 02/SOP 10/V1).

5.3.2 Storing the continuing review package.

The Administrative Officer shall store the original package in the protocol specific file.

5.4 Notifying the Members of the IEC

- The Chairperson /Member Secretary will review the Continuing Review Application Form (AX 02/SOP 10/V1) and inform about the decision to the IEC members at a forthcoming full board meeting or place it before the IEC members at the Full Board meeting. The Chairperson can designate two IEC members (letter of nomination – AX 01/SOP 07/V1) to review the Study report and related documents and inform the decision to the other IEC members at the next full board meeting.
- The Secretariat will send the Continuing Review Application Form (AX 02/SOP 10/V1) to the designated IEC members (letter of nomination – AX 01/SOP 07/V1)

5.5 Protocol Review Process

The IEC Chairperson/ Member Secretary / Members will use the Continuing Review Application Form (AX 02/SOP 10/V1) to guide the review and deliberation process. The IEC members could arrive at any one of the following decisions at the IEC meeting:

1. Noted : The IEC approves the continuation of the above mentioned project without any modifications (as per the format AX 03/SOP 10/V1)
2. Modifications recommended: Protocols that have been suggested modifications by the IEC may not proceed until the conditions set by the IEC in the decision have been met. Protocols should be amended and submitted to the IEC within one month for re-review.
3. The project cannot be continued: The reasons for discontinuation of the project will be mentioned in the letter notifying the decision to the Principal Investigator. This decision shall be recorded by the Member Secretary on AX 02/SOP 10/V1.
 - The IEC Chairperson will sign and date the IEC decision on Continuing Review Report after a decision has been reached.
 - The IEC Secretariat will maintain and keep the IEC Decision forms and minutes of the meeting relevant to the continuing review as part of the official record of the review process.

5.6 Storing the original documents.

Place the original completed documents AX 01/SOP 10/V1 with the other documents in the Continuing Review Package in the protocol file.

5.7 Communicating the IEC Decision to the Principal Investigator

The Secretariat will notify the Principal Investigator of the decision. The letter must be sent to the Principal Investigator within 14 days of the Meeting at which the report was discussed or the decision taken earlier by the Chairperson regarding the Continuing review was informed to the IEC members.

6. References

- [1] World Health Organization, Operational Guidelines for Ethics Committees that Review Biomedical Research, (Geneva 2000) - www.who.int/tdr/publications/publications/ (last accessed 31st August 2013)
- [2] International Conference on Harmonization, Guidance on Good Clinical Practice (ICH GCP) 1996- <http://www.ich.org/LOB/media/MEDIA482.pdf> (last accessed 31st August 2013)

7. Annexure

- Annexure 1 AX 01/SOP 10/V1 Reminder letter by the IEC to investigator
- Annexure 2 AX 02/SOP 10/V1 Continuing Review Application Form
- Annexure 3 AX 03/SOP 10/V1 Project Report Approval letter

Annexure 1

AX 01/SOP 10/V1

Reminder letter by the IEC to Investigator

Date:-

Name of Principal Investigator:-

Department:-

Ref: - Project Title: XXXXXX

The above referenced project was approved by the IEC on XXXXXX and was due for Continuing Annual/ Periodic Review by the IEC. You are requested to submit an Annual/ Periodic status report in the prescribed format (Continuing Review Application Form AX 02/SOP 10/V1) at the earliest, on or before XXXXX.

Signature with date _____

Member Secretary/ Chairperson _____

Annexure 2

AX 02/SOP 10/V1

Continuing Review Application Form

Date: _____

Protocol No.:	Date of IEC approval:
Protocol Title:	
Principal Investigator :	
Department :	
<p>Summary of protocol participants:</p> <p>_____ No. of participants approved by IEC</p> <p>_____ No. of recruited participants</p> <p>_____ No. of ongoing participants</p> <p>_____ No. of Completed participants</p> <p>_____ No. of participants who refused to consent</p> <p>Have any participants been withdrawn from this study?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (state the number and reasons for drop-outs of each participant, attach separate sheet if needed)</p> <hr/> <p>Impaired participants</p> <p><input type="checkbox"/> None</p> <p><input type="checkbox"/> Physically</p> <p><input type="checkbox"/> Cognitively</p> <p><input type="checkbox"/> Both</p> <p>Have there been any amendments in protocol/ Informed Consent Document since the last review?</p> <p><input type="checkbox"/> NO</p> <p><input type="checkbox"/> YES</p> <p>Were these protocol/ Informed Consent Document (ICD) amendments approved by IEC?</p> <p><input type="checkbox"/> No</p>	<p>Has any information appeared in the literature, or evolved from this or similar research that might affect the IEC/IEC's evaluation of the risk/benefit analysis of participants involved in this protocol?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (attach separate sheet if needed)</p> <hr/> <p>Have any unexpected complications or SAEs been noted since last review at our site?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (attach separate sheet if needed)</p> <p><input type="checkbox"/> No. of patients who had SAEs- _____</p> <p><input type="checkbox"/> Whether reports of SAEs at have been submitted to the IEC- _____</p> <p><input type="checkbox"/> Whether reports of SAEs at other sites have been submitted to the IEC- _____</p> <p><input type="checkbox"/> Types of adverse events with nos. of participants- _____</p> <p>_____</p> <p><input type="checkbox"/> Number of unexpected AE</p> <hr/> <p>Have any participating investigators been added or withdrawn since last review?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (Identify all changes in the attached narrative)</p>

<input type="checkbox"/> Yes If no, mention the amendments not approved <hr/> Which protocol amendment is the site following at this date <hr/> Which ICD amendment is the site following at this date <hr/>	Is report of interim data analysis available? <input type="checkbox"/> No <input type="checkbox"/> Yes (submit as an attachment) Is report of the data safety and monitoring board available? <input type="checkbox"/> No <input type="checkbox"/> Yes (submit as an attachment) Have any investigators developed equity or consultative relationship with a source related to this protocol which might be considered a conflict of interest? <input type="checkbox"/> No <input type="checkbox"/> Yes (Append a statement of disclosure)
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Signature of the Principal Investigator with Date: _____

Assessment of Continuing Review Report by the IEC

To be reviewed by

- Chairperson / Member Secretary only and informed to the IEC members at Full Board
- Full Board
- Any 2 IEC members and informed to the IEC members at Full Board

1. Names of IEC members: _____

Signature with date
Chairperson/ Member Secretary

IEC Decision on the Continue Review Report

Decision

Approved and the project can be continued without any modifications

Modifications recommended - requiring protocol resubmission

State the recommendations:

Protocol should be discontinued

State the reasons for discontinuation

Full Board discussion

Any Other

Signature of reviewer/s with date: _____

Final Decision on the Continue Review Report: _____

Signature with date
Chairperson / Member Secretary

Annexure 3

AX 03/SOP 10/V1

Project Report Approval Letter

Name of the Principal Investigator:-

Department :-

Ref: - Project Title: _____

Sub: - Letter dated: _____

This is with reference to the above stated letter regarding the continuing review report of the above mentioned project. The Continuing Review Report was reviewed in the IEC meeting held on XXXXXXXX and was noted.

The IEC allows continuation of the above mentioned project without any modifications. You are requested to submit the next continuing review report within 1 month of the due date i.e. on or before XXXXX.

Signature with date
Member Secretary / Chairperson

Date of approval: