

| PU   | PURPOSE  |  |  |  |
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| This is a tool for investigators that includes considerations and steps to take when assessing         |  |  |  |  |
| feasibility prior to submitting the proposed research. Use of this tool will help to ensure an efficie |  |  |  |  |
| and  | and timely Local Context and IRB review process. This tool should not be included with the submission  |  |  |  |
| for  | for IRB approval. Contact the CW HRPP at any time with questions: cwhrpp@childrenswi.org.              |  |  |  |
|  | Determine the project type (this impacts the review process and submission requirements)               |  |  |  |
|  | Is the project human subjects research? If yes, continue with this checklist.                          |  |  |  |
|  | $\circ$ Projects that are not research or human subjects research do not require a                     |  |  |  |
|  | submission IRB oversight.  |  |  |  |
|  | $\circ$ If you are unsure whether your project is human subjects research, or whether it is            |  |  |  |
|  | something else such as a case/study case/report, or a quality improvement activity,                    |  |  |  |
|  | please review this <u>guidance</u> . If you need a formal, written determination the                   |  |  |  |
|  | guidance has a link to the request form.   |  |  |  |
| So   | ne access mechanisms involving FDA regulated products are not research but do require IRB              |  |  |  |
| ove  | rsight (these are special categories of treatment use)   |  |  |  |
|  | Treatment use of an investigational agent (drug, biologic or medical device)                           |  |  |  |
|  | Humanitarian Use Devices   |  |  |  |
|  | If the project is human subjects research, determine whether Children's Wisconsin is <u>engaged in</u> |  |  |  |
|  | <u>the research.</u>   |  |  |  |
|  | If Children's Wisconsin is considered engaged in the research, review the following materials to       |  |  |  |
|  | determine if applicable to the project.  |  |  |  |
|  |  |  |  |  |
|  | <u>Multi-site research</u>   |  |  |  |
|  | o This guidance contains important information, considerations, and submission                         |  |  |  |
|  | instructions when the research will be conducted at more than one site.                                |  |  |  |
|  | o NOTE: Children's is a separate location (institution) from Froedtert Hospital/Versiti/               |  |  |  |
|  | MCW.   |  |  |  |
|  |  |  |  |  |
|  | FDA regulated research (CW HRPP SOP Manual Section 16)   |  |  |  |
|  | If this project is a clinical trial, particularly one that is investigator initiated, a feasibility    |  |  |  |
|  | assessment is <b>critical</b> and should be done early. We have resources to help with feasibility.    |  |  |  |
|  | Feasibility can be assessed by using one of these tools:   |  |  |  |
|  | <u>Clinical Trial Feasibility Checklist</u>  |  |  |  |
|  | Protocol Feasibility Checklist   |  |  |  |
|  | Contract the CW/LIDDD and we can provide quidenes and success other approximate restricts              |  |  |  |
|  | Contact the <u>CW HRRP</u> and we can provide guidance and engage other appropriate resources such     |  |  |  |
|  | as the Clinical Trials Operations Director (Theresa Kump) and CW Corporate Compliance (Maria           |  |  |  |
|  | Vallejo).  |  |  |  |



|    | Determine whether the Principal Investigator meets <u>CW qualifications to be the PI</u> ; review <u>PI responsibilities</u> (CW HRPP SOP Manual Section 23) and <u>FDA Investigator</u><br><u>Responsibilities</u> . For investigators who are not CW providers, review <u>multi-site research</u> for additional considerations. |
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| AD | DRESS CONSIDERATIONS FOR SPONSORED RESEARCH  |
|    | <ul> <li>If required, ensure study team is knowledgeable and has a plan to maintain compliance with <u>ICH</u></li> <li><u>GCP E6(R3)</u>. To determine if required:         <ul> <li>Review sponsor contract and protocol</li> <li>Consult with CW HRPP</li> </ul> </li> </ul>  |
|    | <ul> <li>Determine who will serve as IRB of record</li> <li>If CW designated MCW pediatric IRBs, no reliance request is needed</li> <li>If an external IRB is being requested or is required, a <u>reliance agreement/deferral needed</u></li> </ul>   |
|    | Determine whether all proposed study team members have current <u>required training</u> in place<br>Assess any conflicts of interest of the PI and all study team members, disclose as needed<br>• <u>CW COI Supplemental Disclosure</u>   |
|    | is sign off process should be completed, and all approvals obtained prior to submitting the  |
|    | oject in eBridge. A copy of required approvals should be included with the submission in section<br>P. Failure to do so will cause delays in the review process.<br>Link to the <u>CW Research Resources Request</u> REDCap Form   |



|   | For questions about the CW Research Resources Request REDCap form or process, contact   |
|---|---|
|   | Theresa Kump at <u>TKump@childrenswi.org</u> .  |
| If services from any other CW department not listed above are needed, submit the four in the CW HRPP guidance <u>Departmental Sign-Off for Research</u> . |   |
|   | Essential contacts for CW departments is available <u>here</u> . This document is on the Children's Connect intranet. If you have trouble accessing the listing, please contact the <u>CW HRPP office</u> . |
|   | Address funding requirements  |
|   | A Billing Plan should be completed and submitted to CW Research Compliance well prior to IRB  |
|   | submission. Contact <u>Maria Vallejo</u> , Research Compliance Program Manager, CW Corporate  |
|   | Compliance and <u>Theresa Kump</u> , Clinical Research Operations Director, Research Administration,  |
|   | for assistance preparing a billing plan.  |
|   | Obtain required sign off and approvals if imaging with radiation is part of the study procedures  |
|   | <ul> <li><u>Radiation and Imaging in Research at CW Flowchart</u></li> </ul>  |
|   | <ul> <li>Complete the resource request linked previously above</li> </ul>   |
|   | • It is very important to determine early what imaging is considered standard of care versus  |
|   | research only. Any imaging done solely for research purposes or additional images for   |
|   | research purposes requires CW Radiation Safety Research Subcommittee review and sign  |
|   | off. Theresa Kump, Clinical Research Operations Director, can assist with this.   |
|   | • Submit <u>Appendix M variance</u> to the state if needed (submit the study once this approval is  |
|   | in hand and can be included with the submission)  |
|   | Create plans for obtaining assent/parental permission, consent at Age of Majority and draft   |
|   | documents utilizing the appropriate <u>templates</u> :  |
|   | Assent of Minors  |
|   | Consent/Parental Permission/Assent of Subjects with Limited English Proficiency   |
|   | <ul> <li>Parental Permission/Consent (see CW HRPP SOP Manual section 15.6.2)</li> </ul>   |
|   | Consent at the Age of Majority  |
|   | • When the parent of a subject is a minor (see CW HRPP SOP Manual section 15.1); consult  |
|   | with <u>CW HRPP</u> if this is anticipated as legal input may be needed   |
|   | If this is sponsored research, have consents reviewed by sponsor prior to submission  |
|   | <ul> <li>Any changes to black template language must be approved by the CW HRPP and the MCW</li> </ul>  |
|   | HRPP (if MCW is serving as the IRB of record). Submit a <u>template change request</u> .  |
|   | Create plan for <u>Recruitment and Enrollment</u> .   |
|   | Determine how data will be stored and used and address compliance with CW policies (describe  |
|   | in application).  |
|   | CW Research - Record Retention Policy for Human Subjects  |
|   | Request to Access PHI for Prep to Research  |
|   | Data Analytics and Tools  |
|   | <ul> <li><u>Data Analytics and Tools</u></li> </ul>   |



|    | Acceptable Storage for CW data (PHI):   |  |  |
|----|---|--|--|
|    | CW or MCW shared drives (intranet)  |  |  |
|    | • CW Box  |  |  |
|    | • REDCap  |  |  |
|    | <ul> <li>Florence eBinders - OnCore</li> </ul>  |  |  |
|    | Encrypted laptop  |  |  |
|    | Encrypted flash drive   |  |  |
|    | PHI cannot be stored in cloud services. Potentially coded or de-identified data could be stored in a cloud service.   |  |  |
|    | CW Corporate Compliance reviews data storage plans for new submissions. Reach out to  |  |  |
|    | <u>CW Corporate Compliance</u> for questions or if the plan includes a platform that is not on  |  |  |
|    | this list.  |  |  |
|    | Assess patient/subject privacy and data confidentiality considerations and create plan for  |  |  |
|    | compliance with CW policies (describe in application) (see <u>CW HRPP Manual</u> section 27)  |  |  |
|    | Assess HIPAA considerations and create plan for compliance with CW policies (describe in  |  |  |
|    | application) (see <u>CW HRPP Manual</u> section 27)   |  |  |
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| IM | PORTANT ADDITIONAL CONSIDERATIONS FOR INVESTIGATOR-INITIATED RESEARCH   |  |  |
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| Conte | act Kristin Busse at the <u>Early-Stage Research Regulatory Oversight Program</u> for assistance.   |
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|       | investigator Initiated Trials (IIT), ensure the PI understands the responsibilities of both the tigator AND the sponsor (PI will be both). Some helpful resources:                            |
|       | FDA Guidance Investigator Responsibilities — Protecting the Rights, Safety, and Welfare of Study Subjects   |
|       | Overview of Sponsor-Investigator Roles and Responsibilities in Clinical Investigations for<br>Drugs and Biologics Orphan Products Grantees  |
|       | When an Investigator is also a Sponsor  |
| If th | <u>Beginner's Guide to Investigator-Initiated Trials</u><br>e research involves more than minimal risk, determine a safety monitoring plan and the need<br>tablish a formal <u>DSMB/DMC</u> . |
|       | in scientific review of the research protocol.  |
| For s | tudies that meet the definition of a <u>Clinical Trial</u> ,  |
| >     | Register <u>Clinical trials.gov listing</u>   |
|       | Training Protocol Registration and Results Reports System (PRS)   |
| •     | If MCW Faculty or Staff is the PI – reach out Jen Brown <u>jlbrown@mcw.edu</u> in the MCW<br>Office of Research for assistance in listing a study   |
| •     | If a CW Employee is the PI - reach out to the <u>CW HRPP</u> office for assistance in listing the study   |