Q H Research Ethics & Governance Forum

*Single ethical review of multi-site clinical trials*

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Melbourne VIC
Countries that have worked to adopt single ethics review for multi-site clinical trials include:

**UK & Europe** – 2001 EU Clinical Trials Directive 2001/20/European Commission

**New Zealand** – 2004 National Multi-Regional Ethics Committee

**Australia** – **NSW** 2007 Single ethics review, PHOs

**Victoria** 2009 Single ethics review for clinical trials

**QLD** 2010 Single ethics review, PHOs

**NHMRC** – 2007 (HoMER) $5.6m Federal Budget
Changing face of clinical trials globally

A shift to large multi-site projects involving numerous institutions at different locations

Attracting clinical trials to Australia & the challenge of global competitiveness
The next step

Interstate

Mutual Acceptance of ethical review
Interstate Mutual Acceptance

Mutual Acceptance of ethical review
for
Multi-site clinical trials
in
New South Wales, Queensland & Victoria
Public Health Organisations
NSW, Queensland & Victoria signed an MOU late in 2010

**Aim**

Reduce duplication of review

One ethical & scientific review only for clinical trials
Planned commencement of mutual acceptance

Second quarter of 2011
Each State will require reviewing HRECs to be **NHMRC Certified** to review **multi-site clinical trials**
NSW, Queensland & Victoria have their own arrangements

Each has a state system for single ethical & scientific review of multi-site research

- NSW – single review of all research (specialist exceptions)
- Queensland – single review of all research (specialist exceptions)
- Victoria - single review of clinical trials (specialist exceptions)
The submission process will depend on the jurisdiction to which the application is being submitted.

**NSW** – the applicant decides on the certified HREC

**Queensland** – submission through the Central Coordinating Service (CCS)

**Victoria** – submission through the Central Allocation System (CAS)
Responsibility for the application:

- Coordinating Principal Investigator (or delegate)

Application must be prepared using:

- Online Forms website - NEAF
- For trials involving Victorian sites, the **Victorian Specific Module** must be completed
Ethics application submission

- An application must be submitted to the Certified reviewing HREC

- Administration of applications using AU RED
Site authorisation

Site Specific Assessment (SSA) will be undertaken:

• by a Public Health Organisation (PHO)

• in compliance with the relevant jurisdictional Standard Operating Procedures

• SSA administration - AU RED

An SSA must be completed for research (clinical trials) to be conducted at public health organisation sites in NSW, Queensland & Victoria
SSA applications must be submitted using:

- NSW SSA Form for research projects in NSW
- QLD SSA Form for research projects in QLD
- VIC SSA Form for research projects in VIC

A separate SSA must be made for each site (PHO) where the research is to be conducted.
What will the process be for health services?

HREC review in Victoria

Applicant

Ethics application process

Book with CAS & communicate with the reviewing HREC
Use Vic (CCHRE) standard monitoring & reporting templates
Use a common PICF

SSA process – the same (individual state process)
What will the process be for health services?

HREC review in Victoria

Reviewing HREC:

- Review according to the National Statement, NHMRC Certified & CCHRE accredited
- The CPI will be from one of the three states
- HREC monitoring & reporting will include interstate sites

Reviewing HREC Coordinator:

- Same processes (SOPs), responsible for document flow
- The CPI will be from one of the three states
- Standard monitoring & reporting templates (CCHRE website)
RGOs

• Same as current processes (SOPs)

• SSA administration - AU RED
What will the process be for health services?

Ethics review conducted in NSW or QLD

**Applicant**

**Ethics application process:**

According to NSW or QLD (CCS) processes

Use standard monitoring & reporting templates

**SSA process**

The same individual state processes
What will the process be for health services?

Ethics review conducted in NSW or QLD

**Principal Investigator**

- Communication & document flow via the CPI

**SSA process**

- The same; state SSA forms (as applicable)
What will the process be for health services?

Ethics review conducted in NSW or QLD

**RGOs**

- SSA same as current processes (SOPs)
- Notification of a proposed trial will be from the PI (on submission of SSA)
- SSA administration – AU RED
Only one Certified HREC will receive an *ethics application* in the single ethical review system.

Site Specific Assessment/Research Governance
Assessment is required by all participating sites.

Linkage of the two processes is through the IT platform, **AU RED**
States – information technology infrastructure

- AU RED - IT platform (Online Forms & AU RED)
- Cooperative development of enhancements
- new AU RED Advanced Reporting capability

Department of Health, Victoria

NSW Health

Queensland Health
**Online Forms website**

- Applicants complete NEAF and SSA applications
- Data is transferred electronically via the IT platform to administrators & investigators

**AU RED website**

- Ethics administration
- Research Governance/SSA administration

**SSAs are linked to the NEAF application – allows tracking**
For the first time:

- **data on clinical trial activity** will be available
- reporting for **Government**
- reporting for **Public Health Organisations**
- clinical trial information for **industry**
Central offices (Vic and Qld)
State-website information/documents
  o Certified HRECs, participating PHOs, RGOs
  o Statutory & legislative requirements (Acts & Regs.)
  o HREC monitoring & reporting framework

Communications
  o Brochure
  o E-bulletin

Training
Presentations
Cooperative and consistent policy development
Streamlining ethical review for clinical trials in Victoria

The first year

November 2009 to December 2010
Benefits – so far
Up to 31 December 2010

Saved 245 additional HREC reviews

69% HREC approvals within 30 working days

50% of SSAs were authorised within 20 working days (post-HREC approval)
Performance & timelines – first year of operations

Use of the CTN scheme

Use of CTN

<table>
<thead>
<tr>
<th>Percentage</th>
<th>CTN</th>
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</thead>
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<tr>
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<td>87</td>
<td>13</td>
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</table>

Department of Health
Performance & timelines – first year of operations

HREC applications according to trial phase

![Graph showing HREC applications by trial phase (First Time in Human, First Time in Patient, Phase 1, Phase 2, Phase 3, Phase 4, Not Applicable) with corresponding percentages: 5, 1, 2, 20, 59, 5, 8)]
Performance & timelines – first year of operations

Trial applications by NHMRC research discipline

NHMRC Primary Discipline

- Cancer: 35%
- Nervous systems: 11%
- Diabetes: 8%
- Cardiovascular: 7%
- Gastrointestinal: 5%
- Arthritis: 5%
- Kidney: 4%
- Mental Health: 4%
- Infectious: 3%
- Other: 18%
Performance & timelines – first year of operations
30 working day benchmark for HREC approval

Victorian Benchmark for HREC Approval

<table>
<thead>
<tr>
<th>Percentage</th>
<th>0 - 30 Working Days</th>
<th>31 - 40 Working Days</th>
<th>41 + Working Days</th>
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<tbody>
<tr>
<td>69</td>
<td></td>
<td>20</td>
<td>11</td>
</tr>
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HREC Approval Time - Working Days - Clock in Use - From Submission Closing Date to HREC Approval Clock Stop Date
Performance & timelines – first year of operations
60 calendar day benchmark for HREC approval

60 Calendar Day Benchmark for HREC Approval Used by Other Bodies

Percentage

0 - 60 Calendar Days: 91
60 + Calendar Days: 9

HREC Approval Time - Calendar Days - Clock in Use - From Submission Closing Date to HREC Approval Clock Stop Date
Performance & timelines – first year of operations
SSA authorisation time – days after HREC approval

SSA Authorisation Time - Working Days (No SSA Clock Stop)

- 0 - 10: 30%
- 11 - 20: 20%
- 21 - 30: 16%
- 31 - 40: 10%
- 40+: 25%

From HREC Approval to SSA Authorisation Clock Stop Date - Working Days
Performance & timelines – first year of operations
Trend in HREC and SSA applications/Month

Number of HREC Applications and SSAs by Month

- Number of HREC Applications
- Number of SSA Applications

Graph showing the number of HREC and SSA applications by month from December 2009 to December 2010. The graph indicates fluctuations in applications throughout the year with a peak in July 2010 and a decline towards November 2010.
Actual times for the overall process
HREC SCD to SSA authorisation

Total Time for the Regulatory Process

HREC Application Number vs Total Calendar Days (SCD to SSA Authorisation)
Overall time the regulatory process

Average 121 calendar days

Range 32 - 335 calendar days
Starting research governance (SSA) **early**

Sponsors & Investigators

References:
- Research Governance checklist
- RGO SOPs
Who is involved in research governance?

**Key role**
Principal Investigator(s)/Coordinating Principal Investigator

**Support role**
Research Governance Officer

**Allied role**
Sponsor – provision of trial documentation, ‘early action’
Organisation’s governance – delegation of authority for SSA authorisation
Evaluation of the Victorian streamlined system – 3 phases:

- Commencement to 30 June 2010: Completed
- 1 July to 31 December 2010: Completed February 2011
- 1 January to 30 June 2011: July 2011
- Reporting to the Consultative Council in late 2011

Development of best practice for HRECs – Colin Thomson
Performance and Monitoring Framework

- Stakeholder groups & responsibilities identified
- Data capture from:
  - AU RED (audit and performance data)
  - Information/general enquiry lines & emails
  - CCHRE website
  - Event evaluation e.g. forums, workshop, information sessions
Audit and Performance of SSAs – follow up

Method

‘Delay’ data collection

From RGO administration

Frequency

Monthly

Output

‘Delay’ data returns from RGO administrators

Identified ‘Delay’ followed up with relevant stakeholder
## Monitoring

### Follow up of SSAs – ‘Delay’ data collection

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
<th>F</th>
<th>G</th>
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<tr>
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<td>HREC Reference Number</td>
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<td>HREC Meeting Date</td>
<td>HREC Approval Date</td>
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<td>Status</td>
<td>Document I.D.</td>
<td>Personnel</td>
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<td>Principal Investigator</td>
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*Department of Health*
## Monitoring

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<th>Comments (if required)</th>
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<tr>
<td>HREC/xxx/Organization/xxx</td>
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<td>xxx HREC</td>
<td>xx/xx/xxxx</td>
<td>xx/xx/xxxx</td>
<td>xx</td>
<td>“Waiting on documents” AMENDMENT</td>
<td>Principal Investigator</td>
<td></td>
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Department of Health
Website: www.health.vic.gov.au/cchre

Email: Multisite.Ethics@health.vic.gov.au

E-bulletin: Streamline E-bulletin

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