

Third Thursday: May 18, 2023



Anthony Keyes, MBA, PMP
Program Administrator, Clinical Research Operations

- Research Coordinator Support Service (RCSS)
- Coordinator Apprentice Program (CAP)
- ClinicalTrials.gov Program



## Research Coordinator Support Service (RCSS)



The ICTR Research Coordinator Support Service (RCSS) is a pool of research coordinators that are available for hire on a part-time basis by Johns Hopkins researchers.



## Overview of Program/Core

- SCAMP was established in 2012
  - —Provide coordinator training to trainees with no clinical research training
- RCSS was established in 2014
  - —Provide services to investigators who needed part-time research support
- SCAMP was been re-branded as the Coordinator Apprentice Program (CAP) in November 2020

SCAMP: Study Coordinator Apprenticeship and Mentoring Program

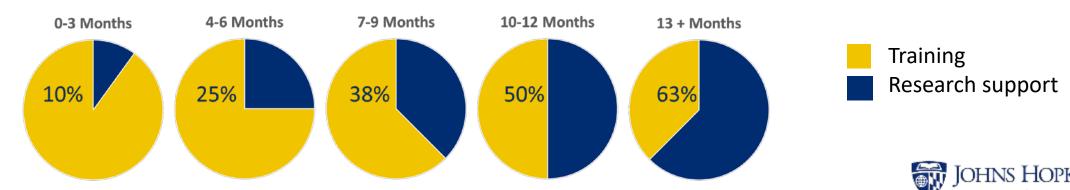
RCSS: Research Coordinator Support Service

**CAP: Coordinator Apprentice Program** 



## Rapid Onboarding -> Early Assignments

- Tracking tool for completion of required courses and the time/course
  - Nearly 150 hours of onboarding
- Multiple short-term work assignments of escalating responsibilities
  - Drugs, devices, behavioral
  - —Sponsored, federally-funded, investigator-initiated
  - —Study status (beginning, middle, end)
  - Diverse participant populations



(e.g., at 4-6 months, the apprentice will aim for 25%, 10 billable hours per 40 hour work week)

## What's in it for them?

- Opportunity
- Shadowing experienced Coordinators
- 1:1 Mentoring
- Expansive access to training
- Scrubs and a personalized lab coat
- SoCRA membership and test fee
- Free parking







## **Current Staff**

Role	Number of Staff
Director	1
Sr. Supervisor	1
Sr. Coordinators	1
RCSS Coordinators	5
Year 2 Apprentices	1
Year 1 Apprentices	7
Total	16





## See one, Do one, Teach one

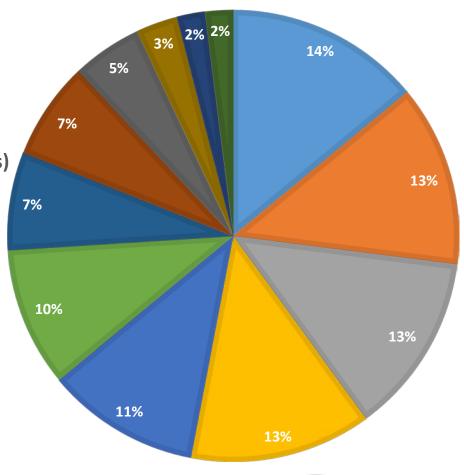
- See one
  - —Shadow experienced coordinators
- Do one
  - —Become an active coordinator
- Teach one
  - —Train a less experienced coordinator

"If you can't explain it simply, you don't understand it well enough" Einstein



## Departments Requests since 2020

- Pulmonary
- Gastroenterology/Internal Medicine/Infectious
- Neuro (Surgery/Onco/Epilepsy)
- Mix (Epid./Geriatrics/Rheumatology/Ortho/Palliative/Immuno./ Onco./others)
- Endocrinology
- Pediatrics (Cardio/Endo/Uro/Nephro/Neuro/GI/Infectious)
- Ophthalmology
- **■** Psychiatry
- **■** Cardiology
- **■** Infectious Disease
- OB/GYN
- **■** Radiology





### How to Connect with us

https://ictr.johnshopkins.edu/service/study-conduct/rcss/







HOME > SERVICES AND RESOURCES > STUDY CONDUCT > RESEARCH COORDINATOR SUPPORT SERVICE (RCSS)

The ICTR Research Coordinator Support Service (RCSS) is a pool of research coordinators that are available for hire on a part-time basis by Johns Hopkins researchers.

Make a Request

#### Contact

Tony Keyes
Program Administrator
akeyes1@jhmi.edu

**About Us** 



### SCOPE of Work

What coordinator responsibilities do you ne support with? (Check all that apply)	☐ Feasibility
support with? (Check all that apply)	<ul> <li>Regulatory support (e.g., IRB applications, binders)</li> </ul>
	☐ Pre-Screening/Screening
	☐ CRMS/Epic
	Scheduling/Consenting participants
	Conducting study visits
	REDCap
	Data entry and mangement
	Study close out
	Other, please specify

- Connection request
  - -1:1 meeting -AND/OR-
  - —REDCap survey
- Assign Coordinator(s)
  - Based on work assignment
  - Ongoing Senior level support



### SCOPE of Work

What is the weekly work schedule needed? (Check all that apply)	<ul> <li>☐ Flexible</li> <li>☐ Mondays</li> <li>☐ Tuesdays</li> <li>☐ Wednesdays</li> <li>☐ Thursdays</li> <li>☐ Fridays</li> <li>☐ Weekends (typically not available)</li> <li>☐ Unsure</li> </ul>
Study location?	<ul> <li>East Baltimore, Please specify location(s)</li> <li>Bayview, Please specify location(s)</li> <li>Greenspring, Please specify location(s)</li> <li>Home visits</li> <li>Remote (no study locations)</li> <li>Other, please specify</li> </ul>

- Scheduling
  - —Prefer fixed times
  - —Can be flexible
- Location
  - —Multiple available
  - Usually the study covers parking with vouchers or reimbursement



## Program Efficiency

- Work Agreements
  - REDCap survey interface
  - Access database that automatically generates Work Agreements
- Monthly Invoicing
  - —Wed-based hours tracking Tool (Clockify)
  - —\$60/hr. Apprentices, Coordinators
  - —\$65/hr. Regulatory Specialists, Sr. Coordinators, Onboarding
  - Detailed description of tasks done



## **Impacts**

- CAP has trained 51\* coordinators since 2012
  - **—81%** (39/48) are still in research
  - -58% (28/48) are still at JHU
- Investigators have turned to RCSS
  - —To take on projects they would normally have to turn down
  - —To support research teams that have lost staff members
  - —To supplement their own staffing/knowledge gaps
  - —To grow research portfolios



<sup>\*</sup>Percentages reported based on 48 we are still in contact with, as 3 are lost to follow-up

### Priorities

- I. Growing research professionals
  - —Hire the right candidates
  - Rapid onboarding
  - Early, study-specific assignments
  - Ecosystem where Apprentices become mentors



- Assist onboarding their staff
- Expand our coordinator onboarding pilot program
- —Contribute to the national discussion with other CTSAs
- —Other Universities considering similar programs
- -Poster presented at ACTS 2023 in DC (04/18/23)
- III. Generate revenue to grow the Program





- Who?
  - -RCSS
- What?
  - —For Principal Investigators and Supervisors
  - Rapidly and efficiently onboard newly hired or less experienced clinical research personnel
  - —Since September 2022, total 21 requests

Completed (Ongoing Support)	Active (Onboarding)	Projected (Coming 2-3 months)	New Requests (Interested)	Cancelled (Fund or project issues or never hired)
8	1	5	3	4



- When?
  - —As early as Day 1
  - —Flexible schedule and prioritized trainings
- Where?
  - —Online courses
  - —Instructor-Led trainings and 1:1 mentoring sessions
- Why?
  - —10 years of experience in training RCSS research coordinators
  - —Strong feedback
  - —Surveys (Coming Soon)



- How?
  - -1:1 meeting with PI/Department
    - Trainee's background
    - Studies' need
    - Training Catalogue (Sample on next slide)
  - Initial meeting with Trainee
    - Trainee's background, soft skills and research path (short term vs long term commitment)
      - Sharpen Skills
      - o Advance
      - O Motivation (Promotion!)



## RCSS Training Catalogue sample

	Training		~Time spent		
☐ Johns Hopkins	□ New Employee Orientation - JHU		2.5 hrs.		
School of Medicine Training	□ SOM   Annual Required Training - 2023 ~		3 hrs.		
(for <u>New</u> hires)	□ Opioid Awareness		2 hrs.		
	☐ Preventing and Addressing Harassment and Sexual Miscon	☐ Johns Hopkins	Either	: Initial Compliance Requirement (for PI and study team with HSR)	11 hrs. for the
	On-boarding: Guidance for the New Employee	Institutional Review Boards		man Subjects Research – Biomedical Research (CITI)	bundle
	☐ MRI Safety Training Level 1	(IRB) Compliar and Recertificat	ice	searchers (CITI) onflict of Interest and Commitment (COI)	
	☐ Developing your Goals	Requirement	1011	inical Research Billing Orientation (CRBO)	
	☐ Benefits Orientation - JHU Faculty and Staff			ecertification Requirement (for PIs and study team members every 3 years)  fresher Course: An Overview of Research with Vulnerable Subjects (CITI)	20 hrs. for the bundle
	☐ Electronic Time and Attendance e210 (Recorded)			fresher Course: Genetics Research (CITI)	
			□ <u>R</u> €	fresher Course: Records Based Research (CITI)	
			□ <u>G</u>	ood Clinical Practice and ICH (CITI)	
		□ NIH/Institution	□ <u>G</u>	ood Clinical Practice and ICH (CITI)	16 hrs.
		Requirement	□ <u>R</u> €	sponsible Conduct of Research (CITI) (every 4 years)	7 hrs.



- How? (Continue)
  - —Customize a training plan
    - Assign trainings (130-200 training hours!)
      - o JHU and IRB requirements, GCP, clinical skills, DOT/IATA, Epic, REDCap, study conduct, soft skills
      - o And more!
    - 1:1 Onboarding sessions (1-2 mentoring hrs. per week for 6-8 weeks)
    - (Optional), RCSS may continue with "Ongoing support" (Sample on Next Slide)
    - Follow up weekly and keep the supervisor informed
- Cost
  - —\$65 per mentoring hour (approximately \$500-\$800)
  - —Monthly Invoices to the Internal Order number (IO#)



# Ongoing Support (Optional)

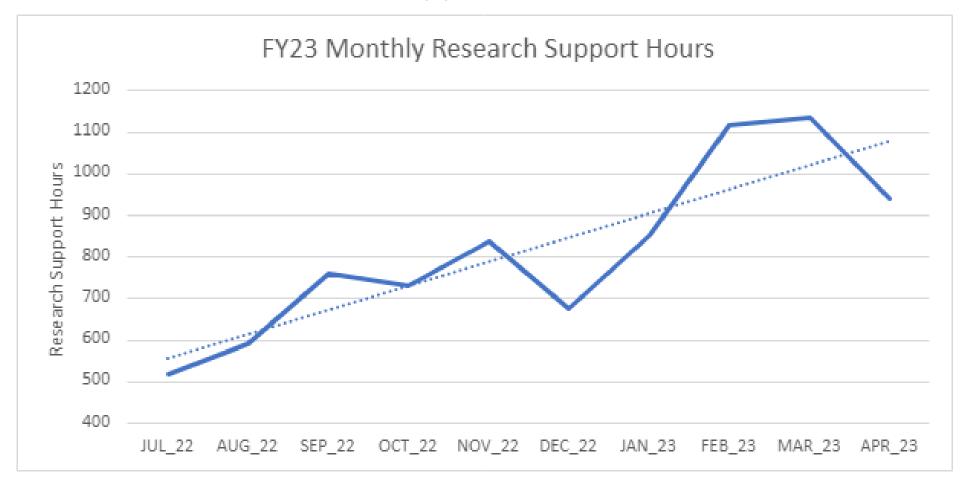
Ongoing RCSS Support: (Continuous RCSS oversigh	t, support and guidance throughout the study process,	Billing by hour)
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☐ Site Selection and	☐ Site Selection Visit (Qualification, Pre-Selection)				
Activation	□ Documents collection (Trainings, CVs, MLs, 1572, FDFs)				
	☐ Site Initiation Visit				
	☐ Logs completion (Training and DOAL)				
☐ Study Conduct	☐ Coordinator-Specific Protocol Review Guide				
(Mentorship, step by step, on daily	□ Study Binder review, logs and documents organization.				
activities with a Senior Coordinator)	New Study team member-Documents collection (IRB Agree to participate, Training Log, DOAL, and documents collection)				
Coordinator)	□ Screening and Inclusion/Exclusion confirming eligibility step by step				
	☐ Consenting (prep, process, documentation, Scanning to Epic, Future contact log, General status log)				
	☐ CRMS (Activation, Enrollment, and Billing) step by step				
	□ Source Documents (CRFs), SOPs/MOPs creation and requirement				
	<ul> <li>Study Visit Conduct, step by step</li> <li>Study visits - <u>BEFORE</u> (Reminders, Informed Consent Forms/Case Report Forms (ICF/CRFs) print, Schedule of Events, Coordinate with PI/team, Schedule procedures)</li> <li>Study visits - <u>DURING</u> (Coordinate with PI/team, register participants in Interactive Response Technology (IRT), CRF completion, Capturing Adverse Events (AEs) Scheduling next visit, Receipts)</li> <li>Study visits - <u>AFTER</u> (Processing and Shipping samples, Data Entry and queries resolution, Documenting Protocol Deviations, Note to Files, Adverse events and Serious Adverse Events reporting, Sponsor invoicing, participants' payments and reimbursements).</li> </ul>				



## Supporting Research at JHU

• Over 8,100 research support hours in the last 10 months (>800/month)





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**About Us** 



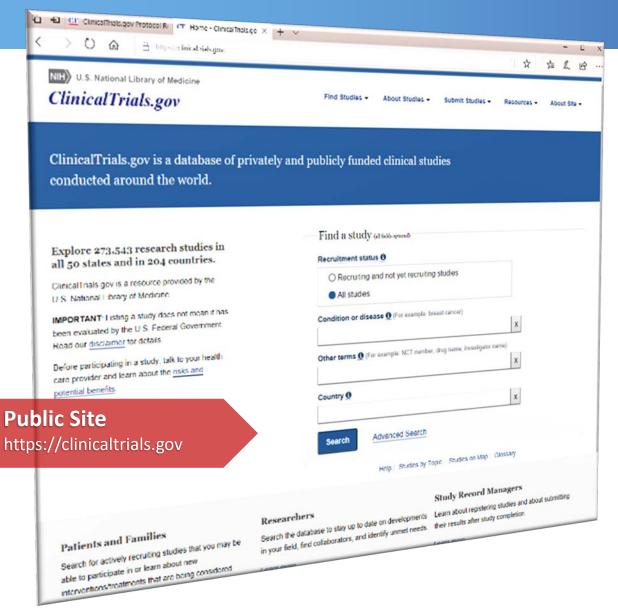
## JHU ClinicalTrials.gov Program

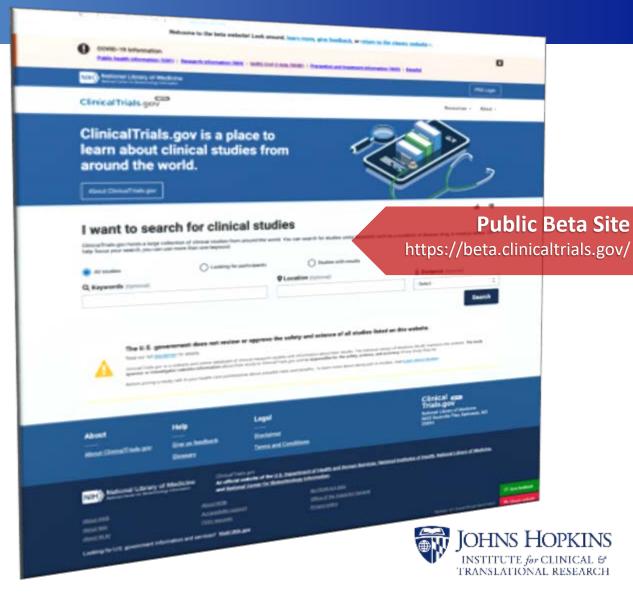


- 1.8 FTE
  - —Monitor >2,000 records across 4 PRS accounts
    - SOM, SON
    - SKCCC
    - JHSPH
    - All Children's
- Regularly assist other AMCs to develop programs
- Maintain 99% compliance and one of the top success rates of all academic sites

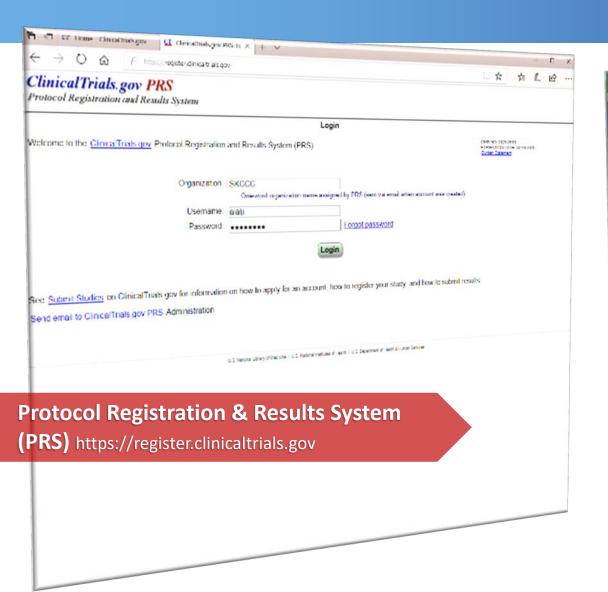


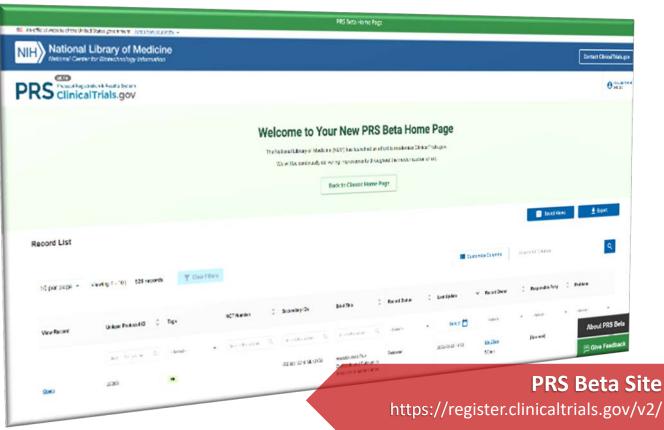
## ClinicalTrials.gov – Public Site





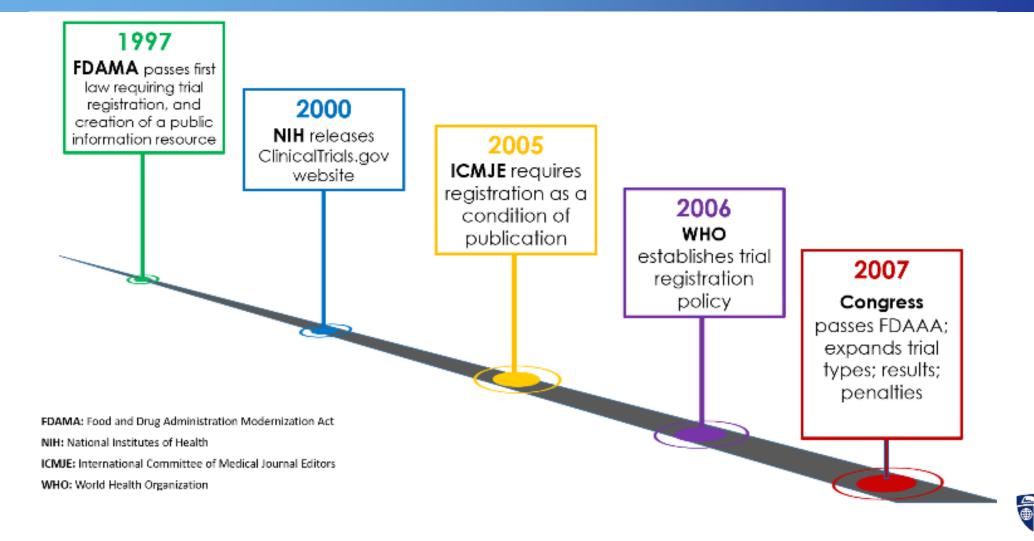
## ClinicalTrials.gov - PRS





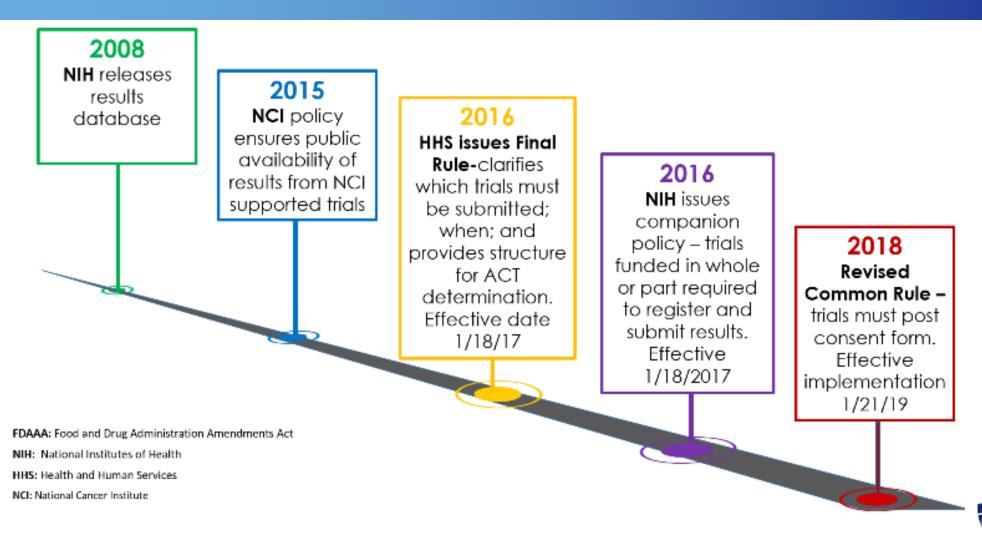


## ClinicalTrials.gov Overview



INSTITUTE for CLINICAL &
TRANSLATIONAL RESEARCH

## ClinicalTrials.gov Overview





## Why a ClinicalTrials.gov Program?

- 1.) Commitment to participants, scientific validity/transparency, responsible stewardship
- 2.) Avoid non-compliance penalties
  - —Civil or criminal judicial actions
  - —Civil monetary penalties up to \$12,462 per study, per day
  - Withholding of current or future funding
  - —Reputational risk (also upside!)
- 3.) Faculty support
  - —Steep learning curve (institutional efficiency)\*
  - —Changing regulations and modernization



## Registration

- Due prior to enrollment
- Any research study meeting the definition of a clinical trial
  - International Committee for Medical Journal Editors (ICMJE)
  - Food and Drug Administration Amendments Act (FDAAA)
  - National Institutes of Health (NIH)
- Any research study with funding from an agency that requires registration
- Any research from a foundation that requires registration as a term or condition of the grant/award



## Results Reporting

- Due 12 months after primary completion date\* Need to start 3-4 months early
- Results reporting reminders are sent to PI/Study team
- Assistance with results reporting
- Assistance with PRS reviewer comments (25 calendar days)
- Changes to PI/Study team (including when a PI leaves)
- Direct services at \$50 per hour (optional)
- \* Final data collection date for primary outcome measure.



#### FDAAA 801 Violations

- Applies to Applicable Clinical Trials (ACT)
- Notices are is sent to the Responsible Party
  - —Pre-Notice Letters are not identified as an FDAAA 801 Violation and not identified in ClinicalTrials.gov
  - —Notice of Noncompliance Letters are identified as an FDAAA 801 Violation in ClinicalTrials.gov



### FDA Enforcement

- FDA has sent 53 Pre-Notice Letters
- FDA has sent 4 Notice of Noncompliance Letters

Responsible Party/Submitter	NCT Number	Notice of Noncompliance	Response Letter (if any)	Civil Money Penalty Amount (if any)
Ocugen	NCT03785340	4/15/2022	08/01/2022	
Petrikovets, Andrey M.D.	NCT03052816	8/31/2021	12/20/2021	
Accuitis Inc.	NCT03064438	7/26/2021	05/26/2022	
Acceleron Pharma, Inc.	NCT01727336	4/27/2021	12/13/2021	

• FDA has, so far, not issues any civil monetary penalties



## FDA/NIH Enforcement

 August 2022 Office of Inspector General (OIG) Report

"NIH did not ensure that all NIHfunded Intramural and Extramural clinical trials complied with Federal reporting requirements"

- FDA and NIH are working together to identify and target noncompliance
- NIH has sent >300 Noncompliance Letters



#### DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health Bethesda, Maryland 20892

October 19, 2022 XXX, Authorized Official Johns Hopkins University

Reference [Grant #]

Dear XXX,

I am writing to you concerning potential non-compliance with clinical trial results information submission requirements for the following NIH grant:

Grant Number: XXX
PI Name: XXX
Period of Performance: XXX-XXX
NIH Institute/Center: NIDA

The following clinical trial(s) funded by this grant is subject to the NIH Policy on the Dissemination of NIH-Funded Clinical Trial Information (NIH policy), NIH Grant Policy Statement, Section 4.1.3.1.

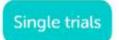
NCTXXXXXXXX [Study Title] Primary Completion Date: XX/XX/XX

Compliance with the NIH policy is a term and condition of this grant award; however, NIDA has been unable to verify that results information has been submitted to ClinicialTrials gov for the clinical trial(s) funded by the above-referenced grant. The standard timeline for submission of results information is not later than one year after the trial's primary completion date. Similar requirements apply if the above-referenced clinical trial is also an "applicable clinical trial" subject to the requirements of Section 801 of the Food and Drug Administration Amendments Act of 2007, including its implementing regulations in 42 CFR part 11.



### FDAAA TrialsTracker





Ranked sponsors





Fund this work!

**y**@FDAAATracker

#### Mho's charing

### Who's sharing their clinical trial results?

FDAAA 2007 is a law that requires certain clinical trials to report results. After a long wait, it effectively came into force for all trials due after January 2018. The FDA are not publicly tracking compliance. So we are, here.





US Govt could have imposed fines of at least \$46,920,219,765



#### Filter trials by status:

Off	Overdue	Off	Overdue (cancelled results)	Off	Ongoing	Off	Reported	Off	Reported (late)
Sear									



### 2023 Articles

Congress demands that FDA and NIH sanction sponsors that fail to report clinical trial results

FDA is petitioned to boost enforcement of trial sponsors that fail to register studies or report results

# NIH waste far over \$100 million in medical research funding every year – new study



# Summary of Requirements

Entity	Registration	Results Reporting	Penalties
Health and Human Services (HHS)	Within 21 days of enrollment	Within 365 days of primary completion date for ACTs	<ul><li>\$13,237/study/day</li><li>Criminal proceedings</li><li>Loss of grant funding</li></ul>
National Institutes of Health (NIH)	Within 21 days of enrollment	Within 365 days of primary completion date for clinical trials receiving NIH funding	Loss of grant funding (to include the institution)
National Cancer Institute (NCI)	Within 21 days of enrollment	Within 365 days of primary completion date of NCI-supported clinical trials (in a peer-reviewed journal and/ <u>or</u> ClinicalTrials.gov)	Loss of grant funding
Veterans Health Administration (VHA)	Prior to release of funding. Prior to enrollment	Within 365 days of primary completion date	Loss of grant funding



# Summary of Requirements

Entity	Registration	Results Reporting	Penalties
Centers for Medicare & Medicaid Services (CMS)	All qualifying clinical trials	Study-specific	<ul><li>Coverage denial</li><li>Costs and fraud investigations</li></ul>
Patient-Centered Outcomes Research Institute (PCORI)	All Clinical studies (including observational)	Expected of all PCORI Clinical studies – 500 word abstract published on PCORI website	• Loss of grant funding
International Committee of Medical Journal Editors (ICMJE)	Prior to enrollment		Ineligibility to publish
Department of Defense (DoD)	Prior to enrollment. Prior to release of funding.	Study-specific	<ul> <li>Withholding or recovery of award funds</li> </ul>



## Responsible Party

"Responsible party means, with respect to a clinical trial, the sponsor of the clinical trial, as defined in 21 CFR 50.3; or the principal investigator of such clinical trial if so designated by a sponsor, grantee, contractor, or awardee, so long as the principal investigator is responsible for conducting the trial, has access to and control over the data from the clinical trial, has the right to publish the results of the trial, and has the ability to meet all of the requirements under this part for the submission of clinical trial information."



## Responsible Party

#### ▼ 3. Sponsor/Collaborators

#### Responsible Party, by Official Title \*

Definition: An indication of whether the responsible party is the sponsor, the sponsor-investigator, or a principal investigator designated by the sponsor to be the responsible party. Select one.

- Sponsor: The entity (for example, corporation or agency) that initiates the study
- Principal Investigator: The individual designated as responsible party by the sponsor (see Note)
- Sponsor-Investigator: The individual who both initiates and conducts the study

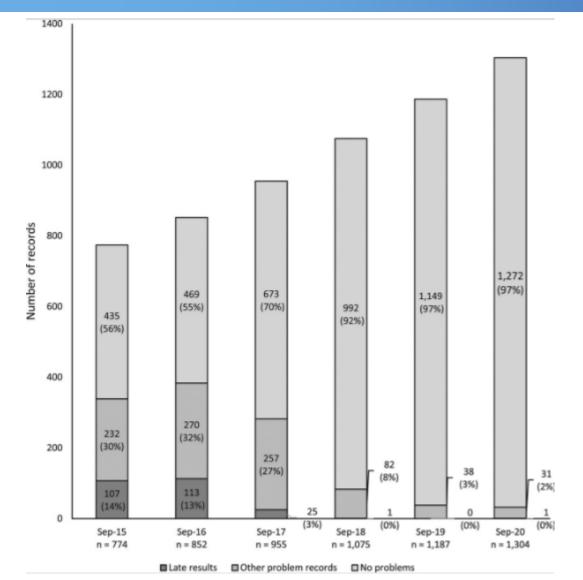
<u>Note</u>: The sponsor may designate a principal investigator as the responsible party if such principal investigator meets all of the following requirements: is responsible for conducting the study; has access to and control over the data from the study; has the right to publish the results of the study; and has the ability to meet all of the requirements for submitting and updating clinical study information.

#### **Requirements:**

- Registration
- Review comments
- Timely updates
- Addressing problems
- Annual Verification
- Anticipated dates
- Uploading consent form
- Results entry



# JHU ClinicalTrials.gov Program(s)



#### **SOM**

- In 2015 we had one of the worst compliant rates at 44% (339/774)
- By 2017 we improved to 30% (282/955)
- Since 2020 we maintain consistently <1%
- Manuscript published

#### **SKCCC**

- In 2018 compliance was 48% (212/442)
- By 2020 we improved to 3% (16/489)
- Since 2021 we maintain consistently <2%</li>
- Manuscript pending

Creating a Program to Support Registering and Reporting Clinical Trials at Johns Hopkins University Keyes A, Mayo-Wilson E, DPhil PN, Lalji A, Tetteh O, Ford DE. Academic Medicine, Vol. 96, No. 4/ April 202. DOI: 10.1097/ACM.0000000000003806



## JHU ClinicalTrials.gov Program

#### Developed a Quality Review Checklist

	Pre-checklist	Post-checklist	p value
Registration, N	107	104	
Success rate (%)	44.86	79.81	<0.001
Submission cycles, mean (SD)	1.74 (0.78)	1.22 (0.46)	<0.0001
Total days in review, mean (SD)	18.90 (26.72)	2.12 (3.85)	<0.0001
Results—Overall, N	44	22	
Success rate (%)	11.36	40.91	0.010
Submission cycles, mean (SD)	2.23 (0.68)	1.64 (0.58)	0.0011
Total days in review, mean (SD)	115.80 (129.33)	39.27 (19.84)	<0.0001

#### CLINICALTRIALS.GOV JHU RECORD REVIEW

PROTOCOL ID	RECORD OWNER	R REVIEWER	☐ Regist☐ Updat☐ Result (add Result	e status	□ pACT/AC □ Non-ACT
DATE RELEASED	COMMENTS DATE	REPLY DATE	Ċ	DATE PUBLISHED	
GENERAL REVIEW ITEM	s			NOTES	
NCT number inc All Warnings ()f All parenthetica All acronyms ha Spell-check com Free-text fields:	tches IRB PI: Record Owner is up-to-date luded in IRB "Clinical Trials Info needed) I citations have been removed we been expanded on their firs	t use tion to report, and d			
PROTOCOL SECTION	Too too, teaming the				
<ul> <li>□ Brief Title does n</li> <li>□ Official title shot</li> </ul>	I ID is the IRB number (IHU Poli not include study type (e.g., Ph uld match what is in the IRB (or clude NIH grant numbers (veri	ase J, Randomized) r grant application if			
☐ Overall Status m ☐ Study start date ☐ Completion Date	ion Date is the current month/ stiches IRB/CHMS verified with CRMS envollment es Actual/Anticipated have been r outcomes are the same the p	t date en evaluated for accu		es are identical	
□ All sources of su	rons ty: Sponsor (JHU Policy) pport identified in IRB "Suppor and if not recognized, "Recogn		on included as	s Collaborators	

Tetteh, O., Nuamah, P., Keyes, A. Addressing the quality of submissions to ClinicalTrials.gov for registration and results posting: The use of a checklist. *Society of Clinical Trials*. Published online August 5, 2020. https://doi.org/10.1177/1740774520942746



## JHU ClinicalTrials.gov Program

- Completed a user satisfaction survey
  - —Guide educational content development
  - Developing video tutorials
- Preparing a follow-up manuscript for developing a program within SKCCC
- Partnering with University of Maryland Baltimore
  - —Customizing the Checklist
  - —Current educational series
- Congratulating Oswald for Matching!





### Continued Success

- We review ~200 records each month and run compliance reports
  - —Each record gets reviewed prior to release
  - Monthly reports identify problems BEFORE they occur
  - —Run monthly IRB reports (change in PI, terminated/expired, no NCT)
  - —We need timely responses from PIs/study teams to ensure compliance
- Departing faculty
  - Nationwide the biggest barrier
  - —Complete the <u>Departing Faculty Checklist/Resignation Questionnaire</u>
- Schedule a Departmental Meeting
  - —Inform your PIs/study teams
  - Departmental compliance reports



## ClinicalTrials.gov Taskforce



- 650 members, 220 Academic Centers
- Monthly Meetings (NLM, FDA, OHRP, NCI, NCATS)
- Many best practices developed
- Active listserv
- Revamping website to be ADA accessible
- Ongoing initiatives (i.e., dashboard for CTSA PIs, train the trainer, follow-up survey\*)

https://ctrrtaskforce.org/

Co-Leads: Sarah White, MRCT; Tony Keyes, JHU

<sup>\*</sup>Mayo-Wilson, E., Heyward, J., Keyes, A. *et al.* Clinical trial registration and reporting: a survey of academic organizations in the United States. *BMC Med* 16, 60 (2018) doi:10.1186/s12916-018-1042-6

# Questions

- https://ictr.johnshopkins.edu/service/study-conduct/rcss/
- akeyes1@jhmi.edu
- https://ictr.johnshopkins.edu/service/regulatory/ct-gov/
- registerclinicaltrials@jhmi.edu

