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U N I V E R S I T Y

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Department of Medicine
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(Saturday 8:22am) 10 June 2000

Memorandum

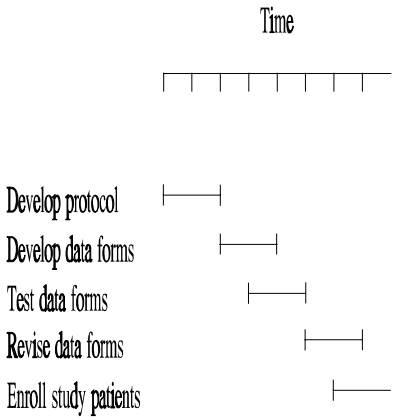
To: Center for Clinical Trials faculty and staff

Fr: Curt Meinert

Re: Startup good practice policies and procedures (GPPP)

Definitions

Gantt chart *n* - [After Henry Laurence Gantt, 1861 - 1919, American engineer] A type of **graphic display** for displaying time requirements for different components of a project as used in planning, coordinating, and monitoring progress in implementation and completion of the project.



start-up design *n* - **Design** relating to **start-up** of an activity; **clinic start-up design**; **patient recruitment start-up design**; **trial start-up design**. rt: **close-out design**

start-up patients *n* - The collective set of **patients** designated as constituting a start-up set for some purpose or function. rt: **test patients**, **vanguard patients** ***Usage note***: Avoid, except when there is some operational meaning or importance given to the designation, as in relation to the way such patients are treated or handled relative to trial-proper patients. See also notes for **test patients** and **vanguard patients**.

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test patients *n* - [**trials**] 1. The collective set of **patients** on whom something will be tested. 2. **start-up patients**; **vanguard patients** ***Usage note***: Avoid in the sense of defns 3 and 4 for **test patient**. In the setting of trials, use should be limited to instances in which there is a need to differentiate between **trial-proper patients** and test patients, eg, because results from test patients are not to be combined with results from trial-proper patients. See also usage notes for **start-up patients** and **vanguard patients**.

vanguard patients *n* - [**trials**] The set of **patients** designated as **vanguard** and on whom the various procedures of the different **visits** called for in the **treatment** and **data collection schedule** of the trial are tested in advance of **trial-proper patients**. rt: **start-up patients**, **test patients** ***Usage note***: Not synonymous with **start-up** or **test patients**, except when those terms are used in the sense above. Limit use to settings in which specific patients are designated as being in a vanguard set (eg, the set represented by the first two patients **enrolled** at each **clinic** in a **multicenter trial**) and where information from that set is intended for use in modifying or adjusting methods or procedures. See also usage notes for **start-up patients** and **test patients**.

P&P 1: Produce a plan for start-up during the design phase of the trial; specify:

- Steps in clearing the trial for enrollment
- Steps in clearing a clinic for enrollment
- Training procedures for study personnel
- Clinic certification procedures
- Categories of personnel to be certified and personnel certification procedures

P&P 2: Specify methods and procedures for ensuring that investigators know requirements for integrity in research and of the consequences if norms or standards of performance are violated.

P&P 3: Specify plan for ensuring that investigators satisfy federal requirements for IRB training and certification.

P&P 4: Present plan, as represented in P&Ps 1, 2, and 3 to the steering committee for review and approval.

P&P 5: If start-up plan includes test or vanguard patients, specify whether such persons are to be included in the finished dataset of the trial; have that specification reviewed and ratified by the steering committee.

Comment

In general, opt, when such patients are included, to exclude data on them from the finished dataset. The purpose of vanguard or test patients is to test systems and forms. Hence, it is generally best to establish at the outset that these data will not become part of the primary dataset of the trial.

P&P 6: List conditions necessary for declaring a trial ready for enrollment.

Comment

The conditions, in the case of drug trials, include the following:

- Approval by the parent and local IRBs
- Consummated funding and contractual agreements
- Availability of packaged and labeled drug for shipment to clinics
- Necessary FDA forms and approvals; FDA Form 1571 (IND application) and FDA Form 1572 for study investigators
- Tested and approved data collection forms
- Data system for receiving and processing forms
- Randomization procedure and system for administration

P&P 7: List conditions necessary for declaring a clinic ready to enroll patients.

Comment

The conditions, in the case of drug trials, include the following:

- IRB approval
- Consummated funding and contractual agreements for the clinic
- Necessary drug and related supplies for enrollment and treatment of patients
- FDA 1572 Forms for clinic investigators
- Necessary forms and related equipment for data entry
- Necessary equipment
- Clinic certification
- Trained and certified clinic personnel

P&P 8: In multicenter trials, opt for a start-up design allowing a clinic to start enrollment when conditions for start have been satisfied (see P&P 7).

Comment

Holding clinics ready to enroll at the starting gate to allow for a common start reduces recruitment efficiency. Generally, there is little to be gained by use of a common enrollment start date, except, perhaps, when clinics are likely to be cleared for enrollment within a narrow time range (rarely the case) or when some form of "National kick-off" is planned.

P&P 9: List tasks that must be completed and times at which they must be completed to meet proposed enrollment start date; display using a Gantt chart; use the list and chart to monitor progress to start-up and for "count down" to enrollment in the "start-up drill" with study investigators.

P&P 10: Produce a system for recording and tracking clearances and approvals needed to clear a center for activities in the trial.

Comment

The tracking is generally best done by preparing and maintaining a table with centers running down the page and with cells for rows in the table used to record dates, such as for:

- Funding agreement signed

- Initial submission to IRB
- IRB approval
- Essential equipment received
- Initial shipment of drug received
- Clinic certified
- Etc