COVID-19 Guidance from Office of Clinical Research:

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Research Guidance and Plans

SUBJECT: Coronavirus (COVID-19) – Research Guidance and Plans

The coronavirus (COVID-19) outbreak infection has reached Ohio with confirmed reports as of March 9, 2020. Study teams and personnel should develop appropriate ways to protect the safety of their study participants and study personnel.

In general, study participants who are taking study product that is treating a health condition should continue on their assigned study product and undergo study visits per their individual protocol. Study medications should be refilled and safety labs obtained per protocol. Some study visits that can be delayed or postponed safely should be done where there is concern about the transmission of COVID-19. This should be decided on a case-by-case basis by the local study lead investigator in consultation with study teams/protocol teams and local institutional officials. For studies that do not involve a study product/medication or device, visits should be postponed and/or conducted by telephone where feasible. Investigators should reach out to protocol/study teams for guidance on how best to proceed when in-person visits are not feasible.

In addition, each investigator should limit study staff to be utilized to conduct visits to limit contact for study personnel, study participants and other individuals. Supervisory research personnel should discuss upcoming schedules in the next 6-8 weeks and how to limit the number of study personnel required to conduct visits that must be completed. All study participants should be contacted by telephone and asked about any respiratory symptoms or fever prior to their visits on the day prior to the scheduled visit. If study participants have any respiratory symptoms or fever they should be referred for appropriate testing before coming to a study visit. Upon arrival to UC Health or UC Medical Center, study participants should be asked again about respiratory symptoms or fever, and, if they report any, should be immediately moved to an isolated room and asked to put on a mask. Study personnel should wear appropriate personal protective equipment when conducting a study visit with a participant who is having respiratory symptoms or fever and refer the study participant for appropriate testing for infectious diseases.

Study investigators should use their best judgment to limit contact that is not absolutely necessary to ensure the safety of the study participant and ensure the integrity of the research.

Guidance for Research Study Visits

Guidance for Research Study Visits and Conduct
COVID-19

PURPOSE

Provide guidelines to the UC/UCHealth research community for COVID-19 screening of research study participants scheduled for campus/hospital research study visits.

Prior to study visit

1. Call study participant 24 hours prior to visit.
2. Review following symptoms with study participant in the last 7 days:

    a. Coughing or Sneezing
    b. Runny nose or congestion
    c. Cold symptoms
    d. Shortness of breath
    e. Fever or chills
    f. Nausea, vomiting or diarrhea
    g. Contact with anyone with the above symptoms in their home, work or school in the last 14 days

3. If the study participant answers yes to any of the above, reschedule the study visit.

On the day of study visit

1. Review following symptoms with study participant in the last 7 days:

    a. Coughing or Sneezing
    b. Runny nose or congestion
    c. Cold symptoms
    d. Shortness of breath
    e. Fever or chills
    f. Nausea, vomiting or diarrhea
    g. Contact with anyone with the above symptoms in their home, work or school in the last 14 days

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Study participants with respiratory symptoms

1. Evaluate clinically and determine need for further medical evaluation.
2. If further evaluation is needed:

a. Immediately move study participant to a room
b. Provide study participant a mask
c. Contact study physician to evaluate

3. If no further medical evaluation is needed:

    a. Tell participants to contact their primary care physicians to ask about arranging for testing for respiratory viral panel and COVID-19
    b. Conduct study visit quickly
    c. Remove from research area
    d. Limit contact with study participant
        i. Wear Personal Protective Equipment to conduct visit (gown, gloves, N-95 mask, face shield)
    e. Perform a clinical assessment for further medical evaluation
    f. Disinfect all surfaces of research area

Also note:

1. When in doubt, contact study physician to evaluate the study participant.
2. Notify appropriate study investigator and study protocol team for guidance on delayed visits, out of window visits or missed visits.

Study product may be shipped to the study participant after consultation with the local PI of record and the study team to avoid interruption.

Policy on remote monitoring

This document details the policies and procedures for Covid-19/Coronavirus screening of external Study Monitors and Auditors at UC Health. This is a system-wide policy that applies to the facilities of UC Health, LLC, University of Cincinnati Physicians Company (UCPC), LLC, and all UC Health associates that conduct clinical research in these and affiliated facilities.

I. PURPOSE

A. The purpose of this policy is to provide guidelines for COVID-19 screening of external monitors and auditors traveling to UC Health for clinical trial-related purposes.

II. PROCEDURE

A. All monitors will be screened within 72 hours prior to their visit to UC Health or University of Cincinnati for COVID-19 symptoms or risk factors.

B. All external monitors will be required to complete the COVID-19 screening form, sent via email, within 72 hours of their visit to the appropriate clinical trials department for which the clinical trial is being conducted.

1. Screening Form Questions:

a) Do you currently have cold-like symptoms including fever, runny nose, or cough?

b) Have you been in contact with anyone who has had cold-like symptoms within the last 14 days?

C. Failure to complete the form within a 72 hour timeframe will result in the following actions:

1. The research study team will place a call to the monitor to complete a verbal screening.

D. Failure to complete the form or verbal screening prior to the visit will result in the following actions:

1. The monitor visit will be terminated and a formal cancellation email will be sent. The monitor will not be allowed on the institution's grounds.

E. If external monitors present with symptoms during their visit we will medically assess whether they need to see a physician or need medical attention and refer them to our ER if appropriate. Otherwise, at the identification of symptoms, we will ask the monitors to leave the premises and reschedule the visit.

F. The screening form must be submitted to all monitors at the time visits are scheduled following the instructions below:

1. Send an email to the monitor asking them to fill out the COVID-19 Monitor Screening Form by using this link: FORM within 72 hours of their visit.
2. For visits already scheduled prior to the official policy date of 3/12/2019, monitors must be emailed the COVID-19 Monitor Screening Form following the process outlined above.

Step by step process:

1. Study coordinators should send the COVID-19 Monitor Screening Form to monitors scheduled to visit campus 72 prior to visit.
2. Monitor completes **form**.

3. OCR receives the completed form.
4. OCR will notify study coordinator, department contact (if provided to OCR) and monitor if they must reschedule visit.
5. For visits already scheduled prior to the official policy date of 3/12/2019, monitors must be emailed the COVID-19 Monitor Screening Form following the process outlined above.

Monitor Screening Form

COVID-19 Monitor Screening Form

Please complete this form prior to your visit to UC Health. At this time we are screening all monitors within 72 hours of their visit to UC Health for COVID-19 symptoms or risk factors. Monitors traveling from a US state with >50 confirmed cases or from a CDC Level 2 or 3 country will be asked to either postpone the visit or conduct remote monitoring.

Complete this form and submit within 72 hours of your visit to our site. If you develop symptoms or travel to areas identified below from the time the form is submitted, please inform your study contact to reschedule your visit.

Failure to complete this form at least 24 hours prior to your planned visit will result in cancellation of the visit. * Required

1. Email address *

Click or tap here to enter text.

2. Name *

Click or tap here to enter text.

3. Company *

Click or tap here to enter text.

4. Site Contact Name *

Name of University of Cincinnati/UC Health Contact

Click or tap here to enter text.

5. Site Contact Email *

Email of University of Cincinnati/UC Health Contact

Click or tap here to enter text.

6. Monitoring Visit Date *

Click or tap to enter a date.

7. Have you been in a state with >50 cases of COVID19 within the past 14 days? Please refer the CDC site for up-to date information: https://www.cdc.gov/coronavirus/2019-ncov/cases-in-us.html * *Mark only one oval.*

☐ Yes

☐ No

8. Have you been in a CDC level 2-3 risk country in the last 14 days? Please refer to the CDC site for up-to-date information: https://www.cdc.gov/coronavirus/2019-ncov/travelers/index.html * *Mark only one oval.*

☐ Yes

☐ No

9. Do you currently have cold-like symptoms including fever, runny nose, or cough? *

☐ Yes

☐ No

10. Have you been in contact with anyone who has had cold-like symptoms within the last 14 days? *

☐ Yes

☐ No

Email completed form to: Trina.Mcfarland@UCHealth.com & Zachary.Johnson@UCHealth.com

If you answered YES to any of the questions on this form a member of our team will contact you to reschedule your visit to our site. Thank you for completing this screening form. Your responses will be used to ensure a safe monitoring environment for you and your colleagues.

WCG guidance

Changes to Research Made in Response to COVID-19

WIRB-Copernicus IRB has received questions from several research sponsors about the appropriate process for making changes to clinical studies in response to the current COVID-19 epidemic. These changes may include things like:

Decreasing the number of protocol-mandated in-person study visits to healthcare facilities

Replacing protocol-mandated visits to healthcare facilities with home visits or telemedicine, allowing blood draws at remote or commercial laboratories

Shipping investigational products directly to research participants

We want to provide information on the requirement for IRB review of changes in research made in response to this situation.

The FDA regulations require that:

Each IRB shall … (a) Follow written procedures for ensuring that changes in approved research, during the period for which IRB approval has already been given, may not be initiated without IRB review and approval except where necessary to eliminate apparent immediate hazards to the human subjects. 21 CFR 56.108(a)(4).

If a sponsor or investigator needs to make a change to research plans in order to eliminate apparent immediate hazards to research participants, these changes can be made and then reported to the WIRB-Copernicus IRB within 5 days, as per WCG policy. Eliminating immediate hazards may include actions to reduce potential exposure to COVID-19, or to continue to provide medically necessary study care (including study drug) to participants who have been placed in isolation or quarantine because of suspected or known exposures. WCG encourages sponsors and investigators to take such steps as necessary to eliminate apparent immediate additional risks to participants.

The notification to the IRB may be a full protocol amendment, but it does not have to be. The notification of the change in research (CIR) plans may also be a memo, letter, or other document that explains the changes being made, and provides enough information for the IRB to assess the relative risks resulting from the changes. The amendment or CIR document will proceed through IRB review as per the usual process.

If you have questions, please contact your WIRB-Copernicus IRB representative, or Client Services, and they will be able to connect you with a member of our regulatory, medical or compliance teams as needed.

Advarra Guidance

Impact of Coronavirus Outbreak on Protocols Under Advarra IRB Review

MARCH 11, 2020

Advarra has policies and processes in place to keep IRB operations functioning as normal during the current coronavirus outbreak.

The coronavirus outbreak has raised concerns among sponsors and study teams about how the outbreak may impact Advarra's operations as well as protocols overseen by Advarra's IRB that are currently enrolling. Advarra continues to have 15 IRB meetings a week, and the IRB has been prioritizing the review of the numerous coronavirus protocols received as well as amendments relating to changes in research conduct because of unforeseen circumstances.

IRB meetings and processes are not impacted by any restrictions on travel. As a standard practice, the IRB meets remotely via video conference technology, and Advarra staff have the resources and flexibility to work remotely.

For sponsors and study teams navigating the outbreak situation, Advarra recommends the following:

1. Submit all changes to research protocols for IRB review and approval prior to implementation, with the exception of incorporating screening questions as described below as well as any measures needed to avoid an immediate apparent hazard to a patient/participant. These exceptions must be promptly reported to the IRB.
    - Screening of research participants: Research participants may be asked to complete a short screening for exposure to coronavirus infection/COVID-19 before in-person interactions. The incorporation of this screening procedure does NOT require IRB approval. The wording below may be changed to accommodate changes in the current public health outbreak landscape but should be comparable to the following:
        - Have you traveled to China, Iran, Italy, Japan, or South Korea in the past 14 days?
        - Have you had any of the following symptoms in the past 14 days without confirmation as something other than COVID-19 (such as a positive flu test, chronic medical condition, etc.)?
            - Fever greater than 100.4 degrees Fahrenheit
            - Cough
            - Difficulty breathing
            - Sore throat
        - In the last 14 days, have you lived with, visited, cared for, or been in a room for a prolonged period of time with someone who is under investigation or has been confirmed for COVID-19?

- If a participant says yes to any of the above questions, it is recommended that study staff identify a resource to direct the participant to.

2. Report to the IRB only protocol deviations and violations that result in an increased harm to participants or others or adversely impact data integrity.
    - This is Advarra's standard reporting requirement; other IRBs' policies may vary.
    - For more information, see section 18.3 of the Advarra IRB Handbook for Investigators, Institutions, Sponsors, and Sponsors' Representatives (available in the Reference Materials section of the Advarra CIRBI Platform [login required]).
3. Review the study to determine if any study procedures that require participants to come to a hospital or a clinic can be eliminated or managed remotely through telemedicine or home visits.
    - This would require an IRB determination stating that changes in these procedures to either eliminate them or manage them remotely would not impact the integrity of the research.
4. If, at the time of continuing review, some studies appear to not be meeting enrollment goals due to coronavirus outbreak-related issues, describe the impact of this outbreak on the study in the continuing review report.
    - The IRB will be mindful of the current situation in its continuing review assessment.
5. If research participants are not able to come to hospitals or clinics because of infection, self-quarantines, or travel restrictions, submit an amendment identifying alternative processes such as:
    - Digital technology to record symptoms.
    - Telemedicine options to provide virtual visits.
    - Visits from visiting nurses or home health aides to conduct study related procedures.
    - Please note that shipping study agents to participants is subject to state and federal laws.
6. Consider remote work options if there may be shortages of study team staff.
    - Also consider establishing back-up coverage plans even when fully staffed.
7. Conduct monitoring activities remotely if appropriate.
    - During this time when travel is discouraged, remote monitoring is a viable alternative to sending monitors to a site. Email, video conferencing and secure file transfer can facilitate this process.

As always, all changes to research should have prior review by the IRB. Investigators are permitted to implement study changes to eliminate immediate hazards to participant safety. Amendments should be submitted to Advarra promptly, describing any changes that have already been implemented and, as appropriate, justification for why changes were put into place prior to IRB review.