PI Supervision and Oversight: Multi-Center IITs

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Abstract

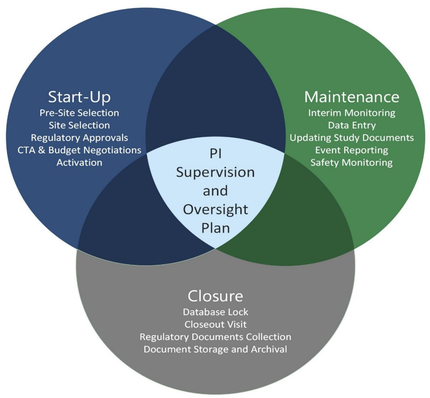
Traditional Investigator Initiated Trials (IITs) have been single centered, however as the clinical landscape of cancer therapies and treatments evolve, the focus shifted to collaboration on a multi-institutional capacity. Multi-center IITs assist in ensuring a clinical trial reaches its enrollment goal at a faster pace than a single center IIT and a diverse population of ages, races and ethnicities are included which is an FDA and industry focus right now. The challenge is how to successfully implement a clinical trial with adequate lead sponsor-investigator supervision and oversight when their offices are in different geographical areas. Per Title 21 of Code of Federal Regulations (CFR), specifically 21 CFR Part 312 and Part 812 Sponsor-investigators must supervise and oversee clinical investigations conducted under Investigational New Drug (IND) and Investigational Device Exemption (IDE). This presentation explores how sponsor-investigators can ensure adequate supervision and oversight in multi-center oncology clinical trials. It also provides insights into the U.S. Food and Drug Administration (FDA) guidance on “Investigator Responsibilities – Protecting the Rights, Safety, and Welfare of Study Subjects”.

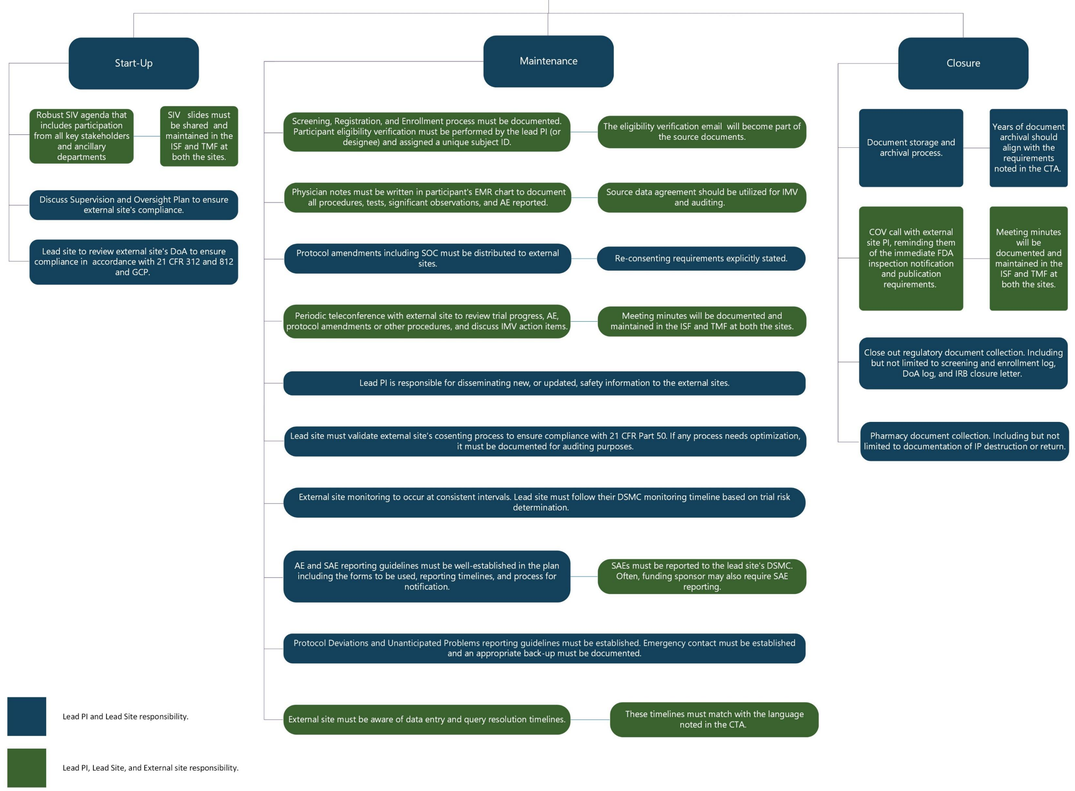
Goals

- Develop an institutional Principal Investigator (PI) Supervision and Oversight Plan for multi-center IITs based on FDA guidance and ICH-GCP.
- Educate and familiarize PIs and clinical research staff with the essential elements of conducting multi-center trials as the lead coordinating center.
- Outline the PI Supervision and Oversight Plan from the perspective of an NCI-designated comprehensive cancer center, incorporating best practices.
- Serve as a model for structuring and implementing multi-center IITs effectively.

Discussion

The Supervision and Oversight Plan is structured into three key stages that align with the lifecycle of a clinical trial: startup, maintenance, and closure. Organizing PI supervision and oversight elements within these stages enhances clarity and promotes compliance among research staff.





Outcomes

Advantages

- Assists sponsor-investigators in understanding their responsibilities under federal and local regulations .
- Serves as a tool for demonstrating subsite supervision and oversight during inspection or audit.
- Enhances the efficiency and effectiveness of clinical trial implementation by providing a well-documented and structured process.
- Supports subsite staff to adhere to the protocol and comply with coordinating center requirements.

Challenges

- The plan must be comprehensive enough to cover all aspects of establishing and maintaining a clinical trial while allowing stakeholders the flexibility to follow their own practices.
- In some instance deviating from the plan may occur due to study specific incidents. Complete and adequate documentation can help remedy it.

Conclusion

Lessons Learned

- PI Supervision and Oversight Plans must be adaptable to trial-specific and institutional needs.
- This discussion emphasizes key FDA guidance elements that are frequently missed or inconsistently followed.
- PIs often lack familiarity with administrative complexities, requiring additional support and education.
- Comprehensive training for clinical research staff is essential for successful multi-center IIT implementation.

Future Directions

- Create eLearning training programs to enhance PI and research staff understanding of oversight responsibilities.
- Develop standardized templates to improve compliance with 21 CFR Part 312 and 21 CFR Part 812.
- Implement continuous assessment strategies to refine and improve PI supervision and oversight plan.

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