National Cancer Institute
US-Latin American-Caribbean Clinical Trials Network (ULACNet) for Prevention of HPV-related Cancers in People Living with HIV

Program Guidelines

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Division of Cancer Prevention
National Cancer Institute
National Institutes of Health
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I. Introduction

a. Purpose of Program Guidelines

The United States-Latin American-Caribbean Clinical Trials Network (ULACNet), funded and supported by the National Cancer Institute (NCI), Division of Cancer Prevention (DCP), focuses on developing evidence to improve and optimize approaches for prevention of HPV-related cancers in people living with HIV in low- and middle-income countries (LMICs) in the Latin American and Caribbean (LAC) region via a U54 Partnership Centers Cooperative Agreement mechanism. This document provides guidelines and instructions for operationalizing ULACNet protocols for grantees and NCI/DCP staff. These guidelines are intended to be used as a resource for the ULACNet to efficiently facilitate the design, conduct, and completion of clinical trials for improving prevention of HPV-related cancers in people living with HIV. These guidelines supplement instructions from the Funding Opportunity Announcement (FOA) RFA-CA-18-018.

b. ULACNet Background, Purpose, and Objectives

i. Background

The human immunodeficiency virus/acquired immune deficiency syndrome (HIV/AIDS) epidemic continues to pose a major global disease burden, with over 30 million individuals infected worldwide, of whom more than 90% reside in LMICs. Those individuals are increasingly accessing affordable combination antiretroviral therapy for HIV infection. Patients receiving antiretroviral therapy are living longer but are at increased risks for cancers etiologically linked to human papillomavirus (HPV), including cervical, vulvar, vaginal, anal, and oropharyngeal cancers. These HPV-related cancers remain a leading cause of mortality and morbidity among people living with HIV in LMICs. The availability, over the past decade, of highly effective prophylactic HPV vaccines offers an unprecedented opportunity for primary prevention for these cancers. Furthermore, screening for and treating women with precancerous lesions is a highly effective strategy for secondary prevention of cervical cancer. Approaches for screening for other HPV-related cancers (e.g., anal cancer) are still under active clinical investigation. Protocols for prevention of HPV-related cancers in people living with HIV have not been refined, particularly in the context of resource-constrained settings where traditional prevention-oriented services (e.g., periodic cervical cancer screening, or HPV vaccination) are either lacking or are sub-optimally functioning. Whereas several efforts have been undertaken to quantify the burden of HPV-associated neoplastic disease in populations of people living with HIV, there have been very few efforts to generate evidence on the utility of clinical strategies to prevent such cancers. In fact, the mere availability of prevention tools or approaches (e.g., HPV vaccines, novel screening tests, non-surgical treatment strategies) does not automatically translate to guidelines for their utilization among people living with HIV. Collaborative clinical trials that seek to answer outstanding research questions related to optimizing frequency and algorithms for implementation of existing and novel interventions are needed to guide evidence-based prevention and treatment strategies for persons living with HIV/AIDS.

The LAC region has a high dual clinical burden of HIV/AIDS and HPV-related cancers. It is estimated that 2 million people are living with HIV in the LAC region, and about 100,000 are newly infected annually. Annual new HIV infections among adults increased by 2% in Latin America and by 9% in the Caribbean between 2010 and 2015. Nine countries in the region have generalized HIV epidemics, and most others have concentrated epidemics among their ‘most-at-risk’ population subgroups including female sex workers and their clients, men who have sex with men and other gender/sexual minorities, and injection drug users. The LAC region also has some of the highest incidence and mortality rates from cervical cancer in the world. The age-adjusted cervical cancer incidence rates range from 20 to 80 per 100,000 women per year, which is 3- to 11-times higher than in the United States. Governments in LAC region are demonstrating stronger commitments than ever before to address burdens of both HIV/AIDS and cervical and...
other HPV-related cancers. Several LAC countries have led the way in creating models of HIV care for other LMICs by providing universal access to affordable antiretroviral drugs for people living with HIV, along with facilitatory health care access policies towards at-risk groups, and enhanced linkages for implementation with non-governmental organizations. Recent strong commitments from LAC region governments have attempted to increase utilization of multilateral bulk procurement mechanisms such as the PAHO Revolving Fund to improve cervical cancer screening and prevention, as well as incorporation of HPV vaccination as part of national immunization programs. There are strong and well-established academic global health partnerships between US academic medical centers and LAC region country counterparts that have hosted long-established NIH-funded clinical trials infrastructures. Such settings in the LAC region that provide a highly capable clinical research workforce and infrastructure for conducting high-quality cancer prevention clinical trials within high clinical disease burden settings also provide the opportunity to demonstrate and evaluate strategies for eventual translation to other LMIC settings.

This network of highly experienced, international researchers and sites will design, conduct, and oversee high-impact, policy-translatable clinical trials via effective collaborative ULACNet Partnership Centers.

ii. Purpose
The purpose of the ULACNet is to efficiently facilitate the design, conduct, and completion of clinical trials for improving prevention of HPV-related cancers in people living with HIV.

iii. Objectives
The ULACNet Partnership Centers will:

• propose, develop, and conduct highly meritorious clinical trials focused on prevention of HPV-related cancers in people living with HIV. These clinical trials will be conducted jointly by the U.S. institution and LAC region country institution at clinical sites in the partnering LAC region countries.

• enhance the ability of the partnering LAC region institution(s) to serve as a national and regional resource for clinical research in prevention of HPV-related cancers in people living with HIV.
II. Organizational Structure for ULACNet
   a. Organizational Chart

   ULACNet: US-Latin American-Caribbean Clinical Trials Network

   NCI/NIH Clinical Trials Oversight Committee

   Partnership Center Coordinating Committee

   University of California, San Francisco, San Francisco, CA
   Weill Medical College of Cornell University, New York, NY
   Fred Hutchinson Cancer Research Center, Seattle, WA

   Partnership Center

   University of California, San Francisco, San Francisco, CA
   Weill Medical College of Cornell University, New York, NY
   Fred Hutchinson Cancer Research Center, Seattle, WA

   Contact PI
   Joel Palefsky, MD
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   Anna Giuliano, PhD, MPH
   Moffitt Cancer Center, Tampa, FL
   Ann Duerr, MD, PhD
   Fred Hutchinson Cancer Research Center, Seattle, WA
   Jorge Salmeron, MD, DSc
   National Institute of Public Health (INSP), Cuernavaca, Morelos, Mexico
   Luisa Villa, PhD
   University of Sao Paulo, Sao Paulo, Brazil
   Robinson Cabello, MD
   Asociacion Civil Via Libre, Lima, Peru

   Clinical Trials Sites and Collaborators

   University of Puerto Rico
   San Juan, Puerto Rico
   Anna Patricia Ortiz, PhD, MPH
   University of Sao Paulo
   Sao Paulo, Brazil
   Luisa Villa, PhD
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   Instituto Dermatologico Dominicano y Cirugia de Piel (IDCP), Santo Domingo, Dominican Republic
   Yeycy Donastorg, MD

   Fred Hutchinson Cancer Research Center
   Seattle, WA
   PATH, Seattle, WA
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   Instituto Dermatologico Dominicano y Cirugia de Piel (IDCP), Santo Domingo, Dominican Republic
   Yeycy Donastorg, MD
b. **ULACNet Partnership Centers**

Each of the three Partnership Centers is designed as a consortium of partnering institutions co-led by the US Program Director/Principal Investigator (“PD/PI”), and the collaborating PD/PI at the LAC partnering institutions.

Each Partnership Center consists of the following components:

1. **Administrative and Coordinating Core**
2. **Data Management and Statistical Core**
3. **Central Laboratory Core**
4. **Clinical Trials Program**

i. **Administrative and Coordinating Core**

Each Administrative and Coordinating Core is responsible for their Partnership Center’s overall project administration, coordination, communication, and management including:

- Training and study monitoring
- Regulatory support
- Liaison with NCI Staff
- Recruitment, retention and adherence efforts
- Convening and liaison with data safety and monitoring boards
- Facilitating career development opportunities for young investigators and trainees
- Ensuring scientific integrity, research productivity, and regulatory and fiscal responsibilities
- Ensuring that all press releases reference the grant number and the program name: *The National Cancer Institute US-Latin American-Caribbean Clinical Trials Network (ULACNet) for Prevention of HPV-related Cancers in People Living with HIV*

ii. **Data Management and Statistical Core**

Each Data Management and Statistics Core will provide for their site technical assistance for statistical considerations in protocol design, and assist with data management, data analysis, and results reporting, and scientific publications. Duties include:

- Providing data management and reporting support to the Partnership Center
- Creating and enforcing data management policies, formulating management techniques for quality data collection to ensure adequacy, integrity, and legitimacy of data, and devising and implementing secure procedures for data management and analysis with attention to all technical and regulatory aspects
- Providing data management support for tracking and improving participant accrual
- Supporting routine and ad-hoc reporting of mandatory clinical trials data to NCI
- Support monitoring and auditing of clinical trials data and processes at participating clinical sites to ensure that all relevant good clinical practice (GCP) guidelines, protocol requirements, applicable in-country and US federal regulatory requirements/regulations, and NIH/NCI/DCP policies are followed
- Providing support for the development, presentation, and dissemination of educational materials and other capacity building resources for recruitment and retention activities
- Supporting efforts in management and storage of biospecimens from ULACNet trials and working with the appropriate NCI/DCP designated biospecimen repository.

iii. **Central Laboratory Core**

Each Central Laboratory Core will be responsible for supporting the laboratory investigations in each clinical trial planned by the Partnership Center, as well as conducting central pathology endpoint reviews, quality assurance for virologic/immunologic testing, and liaison with external labs for specialized biomarker assays for their site. Specific responsibilities include:
• Support the performance of laboratory assays for the primary aims of the clinical trials as well as any secondary/exploratory aims and correlative science studies.
• Planning and undertaking rigorous quality management protocols to ensure internal and external validity of laboratory data
• Developing standard-operating protocols (SOPs) for each protocol on handling study biospecimens
• Optimizing the processes of sample collection, handling, shipment/transfer, and short- and long-term storage and retrieval
• Ensuring domestic and international shipments are in compliance with International Air Travel Association (IATA)-regulations.
• Supporting training and career development of early career investigators in lab research

iv. Clinical Trials Program
The main scientific component of each Partnership Center is centered on designing and conducting three clinical trials focused on prevention of HPV-related cancers in people living with HIV in clinical research sites based in LAC region partnering institutions. The emphasis and choice of focus areas and trials should be reflective of the LAC countries’ priorities, capabilities of each clinical research site’s infrastructures and the available pool of potential research participants for enrollment and retention, and access to appropriate prevention intervention technologies and agents.

Each trial will focus on one or more of the following three broad prevention science areas (Fig 1):
• Area 1: HPV immunoprevention in people living with HIV
• Area 2: Cervical cancer screening and triage approaches for women living with HIV
• Area 3: Evaluating non-surgical strategies for treating HPV-related precancerous lesions among people living with HIV

The trials are expected to address issues that are both high-priority to the partnering LAC countries and are considered aligned with HIV/AIDS research priority areas for the NIH (NOT-OD-20-018). The highest overarching priorities for HIV/AIDS research and guidelines for determining the use of HIV/AIDS-designated funds effective FY 2021 to FY 2025 are: 1) reduce the incidence of HIV/AIDS, including the development of safe and effective HIV/AIDS vaccines and microbicides; 2) develop the next generation of HIV therapies with improved safety and ease of use; 3) discover a cure for HIV/AIDS; and 4) reduce HIV-associated comorbidities and coinfections. Basic research, health disparities, behavioral and social sciences research, epidemiology, information dissemination, implementation sciences, and training that cut across the four priority areas are also supported.

Each trial will:
• be supported by compelling underlying biological rationale and preclinical data
• efficiently and effectively enroll clinical trial participants
• be conducted with available resources and completed within proposed accrual timelines
• be well integrated with the general current state of the field and relevance of clinical and public health needs in the LAC region communities in which it is being implemented.

Prior to concept approvals and study launch, the ULACNet Partnership Center must finalize preparatory steps for the clinical trials (e.g., enrollment strategies, refinement of data collection instruments, staff training, etc.). Each clinical trial protocol must have appropriate IRB approval(s) on file and be reviewed and approved by the Clinical Trials Oversight Committee before activation through the Partnership Center.
III. Program Governance

a. ULACNet Coordinating Committee

This committee, with representation from the Partnership Centers PD/PI and NCI staff, will be responsible for coordinating and harmonizing scientific activities across the funded ULACNet Partnership Centers.

Committee Chair - The Coordinating Committee will be chaired on a rotating basis once per year by each of the three Partnership Center PDs/PIs.

Committee Members
- Each PC may have as many members on the committee as they would like, but will only have one collective vote cast by the contact PI.
- NCI Project Scientist(s), who will have collectively one vote.

Meetings - The Coordinating Committee will meet at least quarterly via teleconference or videoconference to share information on planning, study progress and challenges, preliminary results and analyses in progress. Quarterly meetings will be held in February, May, August, and November. In-person meetings may be held on a yearly basis, as appropriate.
The Committee Chair will be responsible to formulate and share an agenda with attendees 2-4 weeks before each meeting. Any Committee member may propose agenda items in advance of the meeting or during the meeting as time permits. All quarterly meetings will begin with the approval of the prior meeting’s minutes, and review of prior action items. New agenda items distributed in advance are reviewed next. Any tabled agenda items will be carried over to the next meeting. Minutes will be taken by DCP and distributed to all Committee members within two weeks of each meeting. Meeting minutes will reflect the name of meeting attendees, key discussions/votes that occurred, and action items that resulted from the meeting.

b. **Ad Hoc Working Groups**
   The Coordinating Committee may establish working groups/sub-committees as needed, e.g., to address scientific and administrative issues and/or to coordinate policies, harmonize protocols, implement best practices for clinical trials conduct across sites and participating countries, coordinate regulatory approvals, etc. This decision will be made by the existing voting members of the Coordinating Committee.

Current proposed ad hoc working groups include the following groups:

- Recruitment and Retention
- HPV Testing and Screening
- Pre-cancer Treatment

c. **ULACNet Clinical Trials Oversight Committee (CTOC)**
   The Committee will be involved in the NCI decisions about approval and initiation of individual clinical trials, oversight for the conduct of these trials, and coordination with other NCI-funded initiatives. This Committee will be organized by NCI Project Scientist(s) and will be composed of staff representatives from NCI Division of Cancer Prevention, NCI Office of HIV/AIDS Malignancy, NCI Center for Global Health, NIH National Institute of Dental and Craniofacial Research (NIDCR) and other relevant NCI Divisions, Offices, and Centers with appropriate expertise. This Committee will be responsible for final concurrence regarding concept approval and initiation of individual clinical trials.

   In addition, the Committee will provide recommendations to the NCI Project Scientist(s) and the Partnership Center Coordinating Committee regarding oversight for the conduct of these trials, coordination of Partnership clinical trials with other relevant NCI-funded initiatives, and other strategic aspects of the Partnership Centers Program.

   The Committee may convene on an ad hoc basis to recommend suspension, termination, or curtailing an ongoing clinical trial in the event of unexpected-serious adverse events, substantial shortfall in participant accrual, data reporting, inadequate quality control in data collection, suboptimal clinical care of study participants, non-adherence to biohazard precautions, and other serious medical and/or regulatory issues. The Committee may also recommend other corrective actions in case of sub-optimal performance of the awardees and/or their affiliated institutions (including recommendation to restructure sub-contractual arrangements).

d. **Cooperative Agreement Terms and Conditions of Award**
   The following special terms of award are in addition to, and not in lieu of, otherwise applicable U.S. Office of Management and Budget (OMB) administrative guidelines, U.S. Department of Health and Human Services (HHS) grant administration regulations at 45 CFR Part 75, and other HHS, PHS, and NIH grant administration policies.
i. **PD(s)/PI(s) Primary Responsibilities**

- Defining objectives and approaches of the Partnership Center and providing leadership and coordination across clinical trial protocol teams, Core Directors, and collaborating investigators.
- Ensuring scientific integrity, productivity, governance, and fiscal accountability for the Partnership Center.
- Overseeing the Administrative and Coordinating Core and providing overall administration, coordination, communication, and management including, but not limited to, the following activities: training and study monitoring, regulatory support, submission to institutional review boards (IRBs) and institutional oversight committees, recruitment and retention efforts, convening and liaison with data safety and monitoring boards, ensuring certification of all key personnel in training on the Protection of Human Subjects and Good Clinical Practices (GCP).
- Overseeing protocol amendments/status changes, quality assurance efforts, and study monitoring.
- Coordinating efforts with the Data Management and Statistical Core Director(s) for efficient data management and statistical design and analytical aspects of each of the proposed Clinical Trials.
- Coordinating efforts with the Central Laboratory Core Director(s) for efficiently managing and coordinating acquisition and shipping of protocol-specified biological specimens (with relevant clinical data) to appropriate laboratories for testing and tumor/specimen repository for storage of specimens for future correlative laboratory studies.
- Ensuring adherence to requirements regarding investigational drug management and federally mandated regulations and protocol and performance reporting, submission of annual progress reports to the NCI that describe activities and accomplishments during the previous year of funding, and submission of timely reports of all serious and/or unexpected adverse events to the NCI and relevant regulatory agencies.
- Partnering with Co-Chairpersons of each Clinical Trial Protocol to oversee protocol development, including study design, definition of objectives and approaches, planning, implementation, analysis, and publication of results, interpretations, and conclusions.
- Ensuring accurate and timely knowledge of the progress of each study by developing standard procedures for timely data collection and data management consistent with the more intensive data requirements and the need for rapid reporting necessary for pilot, Phase I, and Phase II prevention clinical studies.
- Ensuring protection of confidentiality of research participants at all steps in the submission and analysis of clinical trials data and ensuring the technical integrity and security of the data management systems,
- Providing NCI in a timely manner, upon the request of the NCI Project Scientist, true copies of data files and supporting documentation for all NCI-supported protocols, as well as providing to the NCI periodic study reports to include information detailing patient accrual and demographics, data timeliness, toxicity experienced by study participants, and other items including outcome data as appropriate.
- Establishing routine electronic communication with Clinical Trials site institutions to facilitate study monitoring, and to facilitate the work of the Protocol teams. Relevant communication methods include e-mail, teleconferences, video conferences, and web site postings.
- Providing mentorship and networking opportunities for new/early stage/junior investigators as well as patient advocates in clinical trials research/activities.
- Adhering to and complying with the decisions and recommendations of the NCI Clinical Trials Oversight Committee and Partnership Center Coordinating Committee to the extent consistent with applicable grant regulations.
ii. NIH Staff Programmatic Involvement

**Above and beyond the normal stewardship role in awards, as described below:**

Designated NCI Program Director(s) will have substantial involvement as Project Scientist(s). Additionally, an NCI Program Director, acting as Program Official will be responsible for the normal, scientific and programmatic stewardship of the award and will be named in the Notice of Award (NoA)

Activities of substantially involved NCI staff members will include:

- Ensuring that clinical trials proposed are within the research scope of the Partnership Center Program and relevant to the state-of-the-science, NIH/NCI priorities, resources, and availability of funding.
- Finalizing reviews of clinical trial protocols and amendments after evaluation by the NCI Clinical Trials Oversight Committee and monitoring the progress and performance of the Partnership Centers.
- Serving as a resource for scientific information on trial/study design and as scientific liaison for scientific opportunities resulting from NIH/NCI-supported research programs for facilitating appropriate collaborations.
- Evaluating and approving of clinical trial collaborations with outside organizations including review of any agreements/memoranda of understanding (MOUs) for compliance with NIH/NCI and Federal policies.
- Overseeing data management and monitoring programs for the proposed clinical trials as well as overseeing and participating as necessary in on-site auditing programs and quality assurance programs.
- Overseeing data and safety monitoring plans for the proposed Clinical Trials, and final review and approval of requests for use of any bio-specimens collected per the approved protocol for Clinical Trials.
- Ensuring compliance with the United States Food and Drug Administration (FDA) for any relevant investigational agents and ensuring compliance with OHRP and other federal regulations for research involving human research subjects including compliance with Good Clinical Practice (GCP) guidelines: [https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/good-clinical-practice](https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/good-clinical-practice) and [https://www.fda.gov/media/93884/download](https://www.fda.gov/media/93884/download)
- Reviewing data collected and/or generated under this Cooperative Agreement.

iii. Areas of Joint Responsibility Between the NCI/DCP and the Partnership Centers

- General aspects of collaboration on study development and conduct especially with respect to compliance with federal regulations for clinical trial research, conduct of Data and Safety Monitoring Boards (DSMBs) for relevant phase 3 trials and randomized phase 2 trials will be shared between the NCI/DCP (i.e., the Funding Sponsor) and the Partnership Centers (i.e., the Study Sponsors).
  - Funding Sponsor – NCI/DCP serves as the Funding Sponsor for this Cooperative Agreement, as it is the Federal awarding agency.
  - Study Sponsors – The Partnership Centers serve as the Study Sponsors and are responsible for managing the day-to-day operations of grant-supported activities using their established controls and policies consistent with NIH requirements.

iv. Award Release

- Once the protocol has been reviewed and approved by Clinical Trials Oversight Committee, appropriate IRB approval(s) have been received and any other requirements for Human
Subjects research have been submitted by the Partnership Center’s Office of Sponsored Research to the NCI Grants Management Specialist, a revised NoA will be issued.

IV. ULACNet Protocol Operations

a. DCP PIO Document Management

The Division of Cancer Prevention (DCP), Protocol Information Office (PIO) is the central clearinghouse for clinical trials management within DCP. The PIO will be responsible for receiving, processing, reviewing, tracking, and obtaining approval of all protocol-related information, including concepts, revisions, protocols, amendments, and changes in protocol status.

i. Protocol Naming Convention

*Protocol naming convention will be as follows:*

**ULACNet - Site Number (1, 2, 3) Protocol Number (01, 02, 03)**

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Site Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>University of California, San Francisco</td>
<td>1</td>
</tr>
<tr>
<td>Weill Medical College of Cornell University</td>
<td>2</td>
</tr>
<tr>
<td>Fred Hutchinson Cancer Research Center</td>
<td>3</td>
</tr>
</tbody>
</table>

Example: ULACNet-101
This is the name for the first protocol for UCSF.

b. Required Documents

1. Study Status Update Form
2. Protocol Submission Worksheet (PSW)
3. Protocol
   i. The protocol will be submitted using a ULACNet-specific template and standard PIO versioning.
4. Informed Consent (IC)
   i. Only the English version of IC is required.
   ii. The IC and Protocol are considered one document and therefore must have the same date and version number.
5. Recruitment Materials
   i. Collection is for recruitment repository only. They will not be translated. NCI review will not occur.
6. IRB Approvals
   i. The award prohibits expending human subject funds before IRB approval.
   ii. IRB approval must be received from the US-based institution and one international site for the trial to be “open to accrual” (Section d). All other international site IRB approvals must be submitted as received.
7. Specific Study Timeline with Accrual Ramp-up*

*Study Timeline*

The study timeline should include proposed annual milestones for the clinical trial. There should be clear milestones that provide objective outcomes that justify continuing the project. The milestones included in the study timeline must include achievable goals for the study start-up stage, feasibility stage (if applicable), and completion stage of the project as follows:
• Completion of start-up activities (finalization of protocol, contracting of sites, registration in Clinicaltrials.gov, completion of regulatory approval, if applicable).
• Enrollment of the first subject, and of 25%, 50%, 75%, and 100% of the projected recruitment.
• Expected timing of the proposed interim analysis and, for adaptive trials, implementation of the pre-specified adaptation plan, if applicable.
• Completion of the data collection time period and primary and secondary data analyses.
• Publication of primary trial results and reporting of results in ClinicalTrials.gov.

c. Protocol Submission and Review Process

The PC will submit the first iteration of the protocol, informed consent, and other protocol related documents (outlined in I.b. Required Documents) to the DCP PIO mailbox [nci_dcp_pio@mail.nih.gov] and copy the ULACNet mailbox [ULACNet@mail.nih.gov].

The PIO will review documents for completeness and ensure that the correct protocol number has been assigned. The PIO will notify the ULACNet staff via email that the protocol is ready for review.

The Scientific Program Analyst will coordinate and oversee review meeting logistics, as well as provide a review summary to the PIO. The protocol will be reviewed by ULACNet Clinical Trials Oversight Committee (comprised of internal (DCP) and external (within NCI) staff).

The Scientific Program Analyst will collate comments into a consensus document, and forward the document and review decision (“approval on hold” or “revise and resubmit”) to the PIO.

The PIO will send the formal “approval on hold” or “revise and resubmit” letter to the PC and copy the ULACNet mailbox. If an “approval on hold” is issued, the letter will outline outstanding documents that the grantee must submit to the PIO.

d. “Open to Accrual” Requirements

Once all outstanding documents have been submitted, the PIO will issue a “final study approval/open to accrual” letter. A study can open only after all of the following have been received:

• Protocol approval from ULACNet Clinical Trials Oversight Committee
• US Site IRB approval or acknowledgement letter
• IRB approval or endorsement from regulatory authority responsible for clinical trial approvals for one international accrual site
  o IRB approval/endorsement from each accrual site is required to be submitted as received by the PC to the Scientific Program Analyst via the ULACNet mailbox, but will not delay the initial “open to accrual”
e. **Amendment Submission and Approval**
   The Partnership Center must submit all administrative and scientific amendments to the PIO via the DCP PIO mailbox. The PIO will share the amendment documents with ULACNet staff. Scientific amendments will be reviewed by the ULACNet Program Director and, on an ad hoc basis, by the ULACNet Clinical Trials Oversight Committee. If the amendment is approved by DCP, the PIO will notify the PC of “approval in process” for the amendment and IRB approval will be required to finalize the amendment.

V. **Trial Reporting Requirements**
   a. **NCI Registration and Credential Repository (RCR)**
      It is required for all persons participating in any NCI-sponsored clinical trial to register and renew their registration annually: [https://ctep.cancer.gov/investigatorResources/default.htm](https://ctep.cancer.gov/investigatorResources/default.htm)

   b. **Monthly Minimum Data Set (MDS)**
      US Sites will work with DCP Protocol Information Office and its contractor on data transfer. PIO will send the first page of MDS and PDF page. The ULACNet MDS will include the following data elements:
      - Date Report Submitted
      - Study Identifier (e.g., Lead Org, NCI, CTEP, or DCP Protocol ID Number)
      - Subject Study Identifier
      - Study Site Identifier
      - Zip Code (if US)
      - Country of Residence (if not US)
      - Patient’s Date of Birth MM/YYYY (does not need to include DD)
      - Gender of a Person
      - Ethnicity
      - Subject Registration Date
      - Subject Disease Code
      - Race

   c. **Serious Adverse Events**
      All serious adverse events (SAE) will be reported to Dr. Sahasrabuddhe via ULACNet@mail.nih.gov. The PC must send an initial (24/48-hr) report and a final study medical monitor review report.

   d. **ClinicalTrials.gov Registration and Result Reporting**
      In an effort to make information about clinical trials widely available to the public, the US Department of Health and Human Services issued The Final Rule (42 CFR Part 11) that clarifies and expands the regulatory requirements and procedures for submitting registration and results information for certain trials to ClinicalTrials.gov, in accordance with FDAAA 801. In addition, NIH has issued a complementary policy for registering and submitting summary results information to ClinicalTrials.gov for all NIH-funded clinical trials, including those not subject to the final rule. The Partnership Center is responsible for ensuring adherence to these policies when submitting and updating ClinicalTrials.gov.

   i. **Trial Registration**
      To be compliant with the FDA Amendments Act (FDAAA) Final Rule Section 801 and NIH policies, the Partnership Center is required to register each clinical trial in ClinicalTrials.gov within 21 days of enrollment of the first participant.
ii. **Posting Clinical Trial Protocols**
NCI/DCP PIO is responsible for providing NCI’s Clinical Trials Reporting Office (CTRO) with the most recently approved protocol version (with redaction as needed), including the informed consent, for posting to the public ClinicalTrials.gov website. Protocols must be submitted to CTRO no later than 12 months after the primary completion date.

iii. **Posting Informed Consent Document**
The Partnership Center will post the most recent IRB-approved model consent form to ClinicalTrials.gov within 60 days of the study status changing to “Closed to Accrual and Treatment.”

iv. **Clinical Trial Results Reporting**
The Partnership Center must submit clinical trial results via the ClinicalTrials.gov Protocol Registration and Results System Information Website (https://register.clinicaltrials.gov) in accordance with network policies and procedures. The standard submission deadline for results information is no later than 12 months after the trial’s primary completion date. NIH expects registration of all trials whether required under the law or not. For more information, see http://grants.nih.gov/ClinicalTrials_fdaaa/.

e. **Resource Sharing Plans**
i. **Data Sharing Policy**
The PCs are responsible for following their approved plan for sharing research data. Information on the NIH policy regarding sharing research data can be found on the NIH website at http://grants.nih.gov/grants/policy/data_sharing. Per this policy, requests for data will only be considered once the primary study analyses have been published.

ii. **Biospecimen Sharing Policy**
Partnership Centers are required to follow NCI/DCP policy regarding review of requests for use of banked biospecimens collected in association with ULACNet trials that it leads, which requires approval by a designated review committee. Partnership Centers should also have plans in place regarding resource sharing, as appropriate for the clinical research it conducts.

f. **Data Rights**
NCI will have access to all data generated under this cooperative agreement and may periodically review the data. The awardee will retain custody and primary rights to the data consistent with current HHS, Public Health Service (PHS), and NIH policies.

Awardees will retain custody of and have primary rights to the data and software developed under these awards, subject to government rights of access consistent with current HHS, PHS, NIH, and NCI policies and within the limits of any accepted binding NCI/NIH collaborative agreements with biotechnology and pharmaceutical partners and as governed by NCI-approved Data Sharing Plans and NCI-approved review for use of biospecimens collected in association with ULACNet trials/studies.

g. **Data and Safety Monitoring Requirements**
The NIH policy for data and safety monitoring requires oversight and monitoring of all NIH-conducted or NIH-supported clinical trials to ensure the safety of participants and the validity and integrity of the data. Further information concerning these requirements is found at https://grants.nih.gov/policy/humansubjects/policies-and-regulations/data-safety.htm.
i. **Data and Safety Monitoring Plan**
Each ULACNet PC must adhere to their approved Data and Safety Monitoring Plan including Data and Safety Monitoring Board (DSMB) oversight of relevant network clinical trials. The NIH policies on data and safety monitoring specify that the level and frequency of monitoring should be commensurate with the risks. A DCP Program Official will serve as non-voting (Ex officio) representative to the DSMB. Sites should include ULACNet@mail.nih.gov on Data and Safety Monitoring Board meeting schedules/invitations.

ii. **Clinical Site Monitoring of Each Accruing Organization**
For each trial, the ULACNet Partnership Center must perform routine monitoring of each accruing organization throughout the conduct of the study. Overall areas of review are below outlined.

1. Review of all regulatory documents and assurance of compliance with all relevant regulatory requirements
2. Review of site operations compliance (e.g., compliance with federal regulations/NIH policies for Human Subjects Protection, adequate resource to conduct study, staff training, secure study record storage, research specimen management)
3. Pharmacy review (e.g., investigational agent is secure; agent properly received, stored and inventoried; agent dispensed according to protocol)
4. Review of participant records (e.g., each participant signed correct informed consent version, and met all inclusion/exclusion criteria; review of all SAEs, protocol compliance, accurate/timely collection of study accrual data)
5. Accural metrics (e.g. assessment of accrual pace, challenges, mitigation plans)

All monitoring reports sent to PC from clinical sites should be forwarded to NCI via ULACNet@mail.nih.gov.

iii. **Record Retention and Access**
Awardees generally must retain financial and programmatic records, supporting documents, statistical records, and all other records that are required by the terms of a grant, or may reasonably be considered pertinent to a grant, for a period of 3 years from the date the annual FFR is submitted.

h. **Related Documents**

Other study related documents are available at: www.prevention.cancer.gov/ulacnet including the Protocol Template and Informed Consent Template.
VI. Key Definitions for these Guidelines

- **Alignment with NIH priority research areas**: The NIH has developed a series of guidelines to determine if a research project is ALIGNED with NIH priorities and eligible to receive support with HIV/AIDS-designated funds. The guidelines are not used to assess the scientific or technical merit of a research project. A description of priority topics and examples are provided in NOT-QD-20-018.

- **Accrued Participant**: an individual who has completed the informed consent process, has been deemed eligible through all levels of the screening process, and has started the trial intervention (e.g., actually received the agent and/or intervention to be tested)

- **Clinical trials**: The NIH has clarified its definition of a clinical trial in NOT-QD-15-015. A clinical trial is defined as 'research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of those interventions on health-related biomedical or behavioral outcomes'.

- **ULACNet Partnership Center**: a consortium of partnering institutions co-led by the US Program Director, US Principal Investigator (PD/PI), and the collaborating PD/PI at the LAC partnering institutions.

- **Latin American and Caribbean (LAC) region**: In the context of this network, the LAC region refers to all countries referred as being in the Latin American and Caribbean region in the World Bank classification system http://data.worldbank.org/about/country-classifications/country-and-lending-groups.

- **Low- and Middle-Income Countries (LMICs)**: In the context of this network, LMICs refer to countries classified according to Gross National Income (GNI) per capita as “low-income,” “lower-middle-income,” and “upper-middle-income” in the World Bank classification system http://data.worldbank.org/about/country-classifications/country-and-lending-groups.

- **Program Director/Principal Investigator**: the person in charge of a ULACNet Partnership Center
### VII. Important Abbreviations

<table>
<thead>
<tr>
<th>ABBREVIATION</th>
<th>FULL TERM</th>
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<tbody>
<tr>
<td>AIDS</td>
<td>Acquired Immune Deficiency Syndrome</td>
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<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
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<tr>
<td>CTRP</td>
<td>Clinical Trials Reporting Program</td>
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<tr>
<td>CTRO</td>
<td>Clinical Trials Reporting Office</td>
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<tr>
<td>CTOC</td>
<td>Clinical Trials Oversight Committee</td>
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<tr>
<td>DCP</td>
<td>Division of Cancer Prevention</td>
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<tr>
<td>FOA</td>
<td>Funding Opportunity Announcement</td>
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<tr>
<td>FDA</td>
<td>Food and Drug Administration</td>
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<tr>
<td>GCP</td>
<td>Good Clinical Practice</td>
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<tr>
<td>GMS</td>
<td>Grants Management Specialist</td>
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<tr>
<td>HHS</td>
<td>US Department of Health and Human Services</td>
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<tr>
<td>HIV</td>
<td>Human Immunodeficiency Virus</td>
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<td>HPV</td>
<td>Human Papillomavirus</td>
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<tr>
<td>HSP</td>
<td>Human Subjects Protection</td>
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<tr>
<td>IND</td>
<td>Investigational New Drug Application</td>
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<tr>
<td>IRB</td>
<td>Institutional Review Board</td>
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<tr>
<td>LAC</td>
<td>Latin America and Caribbean</td>
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<tr>
<td>LMIC</td>
<td>Low- and Middle-Income Countries</td>
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<tr>
<td>MOU</td>
<td>Memoranda of Understanding</td>
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<tr>
<td>NCI</td>
<td>National Cancer Institute</td>
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<tr>
<td>NIH</td>
<td>National Institutes of Health</td>
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<tr>
<td>OD</td>
<td>Office of the Director at the NCI</td>
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<tr>
<td>OHRP</td>
<td>Office for Human Research Protections</td>
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<tr>
<td>PAHO</td>
<td>Pan American Health Organization</td>
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<tr>
<td>PHS</td>
<td>Public Health Service</td>
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<tr>
<td>PD/PI</td>
<td>Program Director(s)/Principal Investigator(s)</td>
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<tr>
<td>PIO</td>
<td>Protocol and Information Office</td>
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<tr>
<td>RCR</td>
<td>Registration and Credential Repository</td>
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<tr>
<td>ULACNet</td>
<td>US-Latin American-Caribbean Clinical Trials Network (ULACNet) for Prevention of HPV-related Cancers in People Living with HIV</td>
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