NeuroNEXT Network

Standard Operating Procedure (SOP)

Regulatory Authority Submission and Contact

Version 3.0

SOP NN RA 201

Originators: NeuroNEXT CCC and DCC Personnel

Reviewed and Approved by:

Signature and Date: Christopher S. Coffey *Electronically signed by: Christopher S. Coffey Reason: I approve this document Date: Mar 8. 2024 08:04 CST* 08-Mar-2024
Name and Title: Christopher S. Coffey, PhD (DCC Principal Investigator)
Signature and Date: Merit Cudkowicz *Electronically signed by: Merit Cudkowicz Reason: I approve this document Date: Feb 22, 2024 12:02 CST* 22-Feb-2024
Name and Title: Merit E. Cudkowicz, MD MSc (CCC Principal Investigator)
Signature and Date: Marianne Chase *Electronically signed by: Marianne Chase Reason: I approve this document Date: Feb 22, 2024 14:48 EST* 22-Feb-2024
Name and Title: Marianne Chase, BA (CCC Senior Director of Clinical Trials Operations)

NEURONEXT NETWORK STANDARD OPERATING PROCEDURE FOR REGULATORY AUTHORITY SUBMISSION AND CONTACT

SOP: RA 201 Version No.: 3.0 Issue Date: 01Mar2024 Effective Date: 15Apr2024	REGULATORY AUTHORITY SUBMISSION AND CONTACT	Supersedes : Document Version 2.0 Effective Date : 08Apr2023

Signature and Date:

Dixie Ecklund

Electronically signed by: Dixie Ecklund
Reason: I approve this document
Date: Feb 24, 2024 17:14 CST

24-Feb-2024

Name and Title: Dixie J. Ecklund, RN MSN MBA (DCC Associate Director)

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Electronically signed by: Stacey Grabert
Reason: I approve this document
Date: Feb 22, 2024 13:57 EST

22-Feb-2024

Name and Title: Stacey Grabert, Pharm.D, MS, (CCC Director of Quality Assurance)

Signature and Date:

Joan Ohayon

Electronically signed by: Joan Ohayon
Reason: I approve this document
Date: Mar 11, 2024 11:15 EDT

11-Mar-2024

Name and Title: Joan Ohayon, RN, MSN, CRNP, MSCN (NINDS, NeuroNEXT Program Official)

NEURONEXT NETWORK STANDARD OPERATING PROCEDURE FOR REGULATORY AUTHORITY SUBMISSION AND CONTACT

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1. POLICY

The NeuroNEXT Clinical Coordinating Center (CCC) and Data Coordinating Center (DCC) shall employ individuals who are appropriately qualified and trained to develop complete and accurate regulatory submissions prior to and during clinical trials. These individuals will work with NeuroNEXT Protocol Principal Investigators (PPI) / Investigational New Drug/Investigational Device Exemption (IND/IDE) holder, as the regulatory Sponsor.

Periodic reports to US Food and Drug Administration (FDA) regarding ongoing studies shall be filed by the Sponsor, as required by regulation, with the support of the NeuroNEXT CCC and DCC.

If study changes occur in critical aspects of the study design while the study is under review, or after the study has been initially approved and is underway, the Sponsor will submit an appropriate notification to the FDA (an Amendment or a Supplement to the IND/IDE as applicable). Reasons for submitting an amendment include:

- adding a new protocol to an existing IND/IDE;
- providing additional information to an IND/IDE currently in effect;
- changing the investigational plan; and
- adding a new clinical investigator or site.

All contact between the FDA and Sponsor, in person or via phone, e-mail or facsimile, shall be documented in writing, provided to the NeuroNEXT CCC study specific project manager, and maintained in the regulatory files for the study.

2. SCOPE

This SOP has been developed to be in alignment with federal regulations and Good Clinical Practices (GCP) as set forth in the 2016 Integrated Addendum to ICH E6(R1): Guideline for Good Clinical Practice E6(R2). The policies and procedures described in this SOP apply to the NeuroNEXT CCC and DCC within the context of their oversight and advisory roles for the NeuroNEXT Network, and to all NeuroNEXT investigators, staff, subcontractors, or other entities associated with the NeuroNEXT Network who manage, oversee, and conduct research regulated by FDA and/or applicable review committees.

3. ROLES AND RESPONSIBILITIES

The Sponsor is responsible for ensuring that appropriate FDA staff members are contacted early and as often as necessary to conduct effective and timely meetings with FDA and to develop complete and accurate regulatory submissions.

NeuroNEXT CCC and DCC personnel are responsible for complying with the regulatory requirements that underlie the submission types and the process for requesting FDA input on submissions and for obtaining the appropriate input in developing written correspondence and submissions.

The responsibility to conduct any or all of these activities may be delegated at the discretion of the Sponsor to the NeuroNEXT CCC and/or DCC or to their subcontractors. Those individuals and entities take on responsibility for meeting regulatory requirements on behalf of the Sponsor, but the Sponsor has the ultimate responsibility and must therefore, supervise those delegated activities effectively.

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4. APPLICABLE REGULATIONS AND GUIDELINES

21 CFR 312.2	Applicability
21 CFR 312.7	Promotion and Charging for Investigational Drugs
21 CFR 312.10	Waivers
21 CFR 312 Subpart B	Investigational New Drug Application
21 CFR 312 Subpart C	Administrative Actions
21 CFR 312.20	Requirements for an IND
21 CFR 312.21	Phases of an Investigation
21 CFR 312.23	IND Content and Format
21 CFR 312.30	Protocol Amendments
21 CFR 312.34	Treatment Use of an Investigational Drug
21 CFR 312 Subpart E	Drugs Intended to Treat Life-threatening and Severely Debilitating Illnesses
21 CFR 312 Subpart F	Miscellaneous
21 CFR 312.64	Investigator Reports
ICH E6, 5.10	Notification/Submission to Regulatory Authorities
FDA	Guidance for Industry: Content and Format of Phase I Investigational New Drug Applications (INDs) for Phase I Studies of Drugs, Including Well-Characterized, Therapeutic, Biotechnology-Derived Products (November 1995)
FDA	Guidance for Industry: Formal Meetings Between the FDA and Sponsors or Applicants (May 2009; Revision 1)

5. REFERENCES TO OTHER APPLICABLE SOPS

NN GA 102	SOP Training
NN GA 103	Document Development and Change Control
NN RA 205	Adverse Event Reporting
NN PA 301	Clinical Protocol Finalization and Maintenance
NN PA 302	Protocol Working Group Formation and Proposal Development
NN PM 501	Communications

6. ATTACHMENTS AND REFERENCES

NN RA 201-A	Document History

7. TERMS AND ABBREVIATIONS

The following terms and abbreviations are used in this document:

CCC	Clinical Coordinating Center at Massachusetts General Hospital

DCC	Data Coordinating Center at The University of Iowa
FDA	U.S. Food and Drug Administration
GCP	Good Clinical Practice
ICH	International Council for Harmonization
IDE	Investigational Device Exemption
IRB	Institutional Review Board
IND	Investigational New Drug
PPI	Protocol Principal Investigator

8. SPECIFIC PROCEDURES

A. IND Development and Submission

#	*Who*	*Task*	*Attachment/ References*	*Related SOP*
1.	NeuroNEXT PPI, CCC and/or DCC	Check the FDA website to ascertain whether any specific written guidance on content for required submissions already exists.		
2.	NeuroNEXT PPI/ Sponsor	Follow the process in NN GA 102, Document Development and Change Control for drafting, reviewing and approving IND submissions.		NN GA 102
3.	NeuroNEXT PPI/ Sponsor	Once the investigational plan and clinical protocol are final, prepare the IND submission and collect required information, as needed.		
4.	NeuroNEXT PPI/ Sponsor	Send the original IND and two (2) copies to the applicable center via registered mail or an appropriate courier service; or submit via FDA eSubmission portal		
5.	NeuroNEXT PPI/ Sponsor	If FDA requires additional information prior to granting approval of the IND, provide the information within specified timeframes or as soon as possible.		
6.	NeuroNEXT PPI/ Sponsor	If significant safety issues arise, ensure that reporting and notifications are carried out as required.		NN RA 205
7.	NeuroNEXT PPI/ Sponsor, CCC and/or DCC	If FDA disapproves the IND, do not proceed with the study until all issues identified by FDA are resolved.		
8.	NeuroNEXT PPI/ Sponsor, CCC and/or DCC	If the disapproval letter from FDA specifies that the study may proceed after certain corrections are made without its explicit approval, proceed with the study after the corrections are put into place.		

#	Who	Task	Attachment/ References	Related SOP
9.	NeuroNEXT PPI/ Sponsor, CCC and/or DCC	If the terms of the disapproval letter require an FDA notification to proceed with the study, do not proceed until notification is documented.		

B. IND Amendments

#	Who	Task	Attachment	Related SOP
1.	NeuroNEXT PPI/Sponsor, CCC and/or DCC	Ascertain when additional information or changes to the study must be reported to FDA in an IND Amendment.		
2.	NeuroNEXT PPI/Sponsor	File amendment(s) as required.		
3.	NeuroNEXT PPI/ Sponsor, CCC and/or DCC	If FDA (and/or Single IRB) approval is needed, do not implement changes until approval is documented.		
4.	DCC	Generate required data tables to facilitate required annual reports to the FDA		
5.	NeuroNEXT PPI/ Sponsor	Submit all required reports as indicated.		

C. FDA Communication

#	Who	Task	Attachment	Related SOP
1.	NeuroNEXT PPI/ Sponsor,	Contact appropriate FDA staff members prior to initial IND submission.		
2.	NeuroNEXT PPI/ Sponsor, CCC and/or DCC	Maintain written records of all correspondence between FDA and the Sponsor.		

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Attachment NN RA 201 - A. Document History

NeuroNEXT Network Standard Operating Procedure (SOP) Regulatory Authority Submission and FDA Contact SOP NN RA 201					
Version	**Description of Modification**	**Reason or Justification for Modification**	**Issue Date**	**Effective Date**	**Reviewer(s)**
1.0	New	N/A	22Mar2012	21Apr2012	N/A
1.0	Reviewed – no changes (2016)	N/A	22Mar2012	21Apr2012	N/A
2.0	Updated “1996 ICH E6 Consolidated Guidance” to “2016 Integrated Addendum to ICH E6(R1): Guideline for Good Clinical Practice E6(R2)”. Updated signature block to accommodate for electronic signatures. Additional minor updates throughout.	Updated for version 2.0	22Feb2023	08Apr2023	Catherine Gladden
3.0	Updated definitions in section 7	Periodic review	01Mar2024	15Apr2024	Preeti Paul

NN RA 201 Regulatory Authority Submission and Contact v3.0 2feb2024 clean

Final Audit Report 2024-03-11

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By:	Tania Leeder (tleeder@mgb.org)
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Number of Documents:	1
Document page count:	7
Number of supporting files:	0
Supporting files page count:	0

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Document created by Tania Leeder (tleeder@mgb.org)
2024-02-22 - 5:57:41 PM GMT

Document emailed to christopher-coffey@uiowa.edu for signature
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2024-02-22 - 6:01:48 PM GMT

cudkowicz.merit@mgh.harvard.edu authenticated with Adobe Acrobat Sign.

Challenge: The user opened the agreement.

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Signer cudkowicz.merit@mgh.harvard.edu entered name at signing as Merit Cudkowicz

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Stacey Grabert (SGrabert@mgh.harvard.edu) authenticated with Adobe Acrobat Sign.

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Marianne Chase (mchase@mgh.harvard.edu) authenticated with Adobe Acrobat Sign.

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2024-02-22 - 7:55:15 PM GMT

Tania Leeder (tleeder@mgb.org) added alternate signer ecklundd@uiowa.edu. The original signer dixie-ecklund@uiowa.edu can still sign.

2024-02-23 - 6:57:13 PM GMT

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2024-02-23 - 6:57:14 PM GMT

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2024-02-24 - 11:13:59 PM GMT

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2024-02-24 - 11:14:21 PM GMT

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2024-02-24 - 11:14:34 PM GMT

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Signature Date: 2024-02-24 - 11:14:37 PM GMT - Time Source: server

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2024-03-08 - 9:19:54 AM GMT- IP address: 172.226.137.0

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Challenge: The user opened the agreement.

2024-03-08 - 2:04:42 PM GMT

Signer cscoffey@iowa.uiowa.edu entered name at signing as Christopher S. Coffey

2024-03-08 - 2:04:57 PM GMT- IP address: 128.255.113.139

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ohayonj@ninds.nih.gov authenticated with Adobe Acrobat Sign.

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Signer ohayonj@ninds.nih.gov entered name at signing as Joan Ohayon

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Signing reason: I approve this document

Signature Date: 2024-03-11 - 3:15:36 PM GMT - Time Source: server- IP address: 72.83.187.43

Agreement completed.

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