NeuroNEXT Network

Standard Operating Procedure (SOP)

Document Translation

Version 1.0

SOP RA 208

Originators: NeuroNEXT CCC and DCC Personnel

Reviewed and Approved by:

Christopher S. Coffey, PhD (DCC Principal Investigator)

Merit E. Cudkowicz, MD MSc (CCC Principal Investigator)

Marianne Kearney, BA (CCC Director of Clinical Operations)

Dixie J. Ecklund, RN MSN MBA (DCC Associate Director)

Katherine B. Gloer, PhD (DCC Quality Management Lead)

Claudia Moy, PhD (NINDS, NeuroNEXT Administrative Program Director)

Issue Date

April 6, 2012

Effective Date (30 calendar days after the Issue Date)

May 6, 2012
1. POLICY

It is the policy of the NeuroNEXT Network that study documents may require translation from English into non-English languages, or from non-English languages into English, to support specific site or study subject populations. Translation services may be contracted for translating NeuroNEXT Network essential document templates, or for Clinical Study Site (CSS)-specific documents. The Protocol Principal Investigator (PPI), Data Coordinating Center (DCC), Clinical Coordinating Center (CCC), the Central Institutional Review Board (CIRB), or a CSS may serve as the party contracting with the translation service vendor, depending on the protocol and type of document requiring translation. Documents that may require translation may include model or site-specific Informed Consent Forms, study drug or study procedure instructions, study drug container labels, recruitment and marketing materials, or other documents as appropriate to the study.

Translation of any study document will be completed by qualified translation vendors that have been vetted and approved by the PPI, DCC, CCC and/or the National Institute of Neurological Disorders and Stroke (NINDS) as necessary.

2. SCOPE

This SOP has been developed to be in alignment with federal regulations and Good Clinical Practices (GCP) as set forth in the 1996 ICH E6 Consolidated Guidance. The 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

It is the responsibility of the PPI, in collaboration with the CCC, DCC, and/or CIRB as necessary, to identify the need for translation of template or study-wide documents and to include estimated costs for this service in the clinical trial budget.

It is the responsibility of the CSS Principal Site Investigator to identify documents that may require translation due to local subject population needs, and to communicate this need to the PPI, CCC, CIRB, and/or DCC.

The PPI is responsible for selecting, in consultation with CCC, DCC, and/or CIRB, a qualified vendor to perform translations and back-translations, if needed. The following criteria may be used in completing vendor selection:

1. The vendor has achieved certification in quality management through ISO 9001:2000.
2. The vendor provides translators who are fluent in the native language requested for translation.
3. The vendor provides translators fluent in numerous languages.
4. The vendor provides translators experienced in medical terminology.
5. The vendor provides independent back translations.
6. The vendor provides translations in an acceptable timeframe and at an acceptable fee.
7. The vendor will provide a certificate of authenticity for all translations.

The PPI, in collaboration with the CCC, DCC and/or CIRB, is responsible for providing the final versions of any English-language documents that require translation. The appropriate party (PPI, DCC, CCC or CSS) will contact
the vendor and initiate a contract for translation and back-translation, as needed. Back-translation allows for QA of the translated documents. If back-translation is completed, the following steps may be taken:

1. The CCC performs a quality assurance review of all back-translated documents by comparing the language in the back-translations with the original English versions of the translated documents.
2. The CCC provides the translated, reviewed back-translated, and original English-language documents to the PPI for review.
3. The CCC and PPI review the documents via email or teleconference to discuss any discrepancies.
4. If requested, the CCC provides the translated, back-translated, and original documents to the local site for further review by personnel who speak the native language of the translated documents (if available).
5. If there are unresolved discrepancies, the CCC requests that the contracted vendor have an independent translator review the documents and clarify each discrepancy.
6. When all discrepancies are resolved, all translated and back-translated documents are finalized (closed to further translations), provided to the necessary study personnel, and stored in the Trial Master Files with the original English-language documents.

The CCC is responsible for providing the translated documents to the CSS, and for filing translated versions of essential study documents in the Trial Master File along with the English-language versions of the documents.

The responsibility to conduct any or all of these activities may be delegated at the discretion of the Sponsor to the NeuroNEXT DCC, CCC, CIRB, or CSS staff. Those individuals and entities also 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.

4. APPLICABLE REGULATIONS AND GUIDELINES
   21 CFR 312.50 General Responsibility of Sponsors
   ICH E6, 2.7 The Principles of ICH GCP

5. REFERENCES TO OTHER APPLICABLE SOPS
   NN GA 103 Document Development and Change Control
   NN GA 105 Vendor Selection and Agreements
   NN RA 202 Trial Master File Maintenance
   NN RA 204 Model Informed Consent Form Preparation
   NN PM 502 Clinical Trial Budget Development
   NN PM 503 Study Materials Development

6. ATTACHMENTS AND REFERENCES
   NN RA 208-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
   CFR Code of Federal Regulations
   CIRB Central Institutional Review Board (Partners Healthcare)
   CSS Clinical Study Site
   DCC Data Coordinating Center at The University of Iowa
   FDA Food and Drug Administration

NN RA 208
ICH  International Conference on Harmonisation  
NINDS  National Institute of Neurological Disorders and Stroke  
PPI  Protocol Principal Investigator

8. SPECIFIC PROCEDURES

A. Study-Wide Document Translation

| #  | Who                        | Task                                                                 | Attachment/ References | Related SOP     |
|----|----------------------------|                                                                     |                        |                |
| 1  | PPI / CCC or DCC designee | Identify need for document translation.                           | NN GA 103              | NN RA 204      |
| 2  | PPI or designee            | Include estimated cost for document translation in clinical trial budget. | NN PM 503              |                |
| 3  | PPI / CCC or DCC designee | Evaluate and secure an appropriate translation vendor.             | NN GA 105              |                |
| 4  | PPI / CCC or DCC designee | Determine the need for back-translation and complete review of back-translated documents, if necessary. |                        |                |
| 5  | CCC                        | Distribute translated documents to CSS staff, CIRB, DCC and/or other parties as required. |                        |                |

B. Site-Level Document Translation

<p>| #  | Who                        | Task                                                                 | Attachment/ References | Related SOP     |
|----|----------------------------|                                                                     |                        |                |
| 1  | CSS Principal Investigator or designee | Identify need for document translation and communicate this need to CCC. | NN GA 103              | NN RA 204      |
| 2  | PPI or designee            | Include estimated cost for document translation in clinical trial budget | NN PM 503              |                |
| 3  | CSS / PPI / CCC or DCC designee | Evaluate and secure an appropriate translation vendor.             | NN GA 105              |                |
| 4  | CSS / PPI / CCC or DCC designee | Determine the need for back-translation and complete review of back-translated documents, if necessary. |                        |                |
| 5  | CCC                        | Ensure that the final version of the translated site-specific document is distributed to the DCC, CIRB and/or other parties as required. |                        |                |
| 6  | CCC                        | File translated, back-translated, and original versions of essential study documents in the Trial Master File. | NN RA 202              |                |</p>
<table>
<thead>
<tr>
<th>Effective Date</th>
<th>Issue Date</th>
<th>Modification Date</th>
<th>Reason for Modification</th>
<th>Description of Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>New</td>
<td>1.0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

SOP NN RA 208
Document Translation
NeuRoNEXT Network Standard Operating Procedure (SOP)

Attachment NN RA 208 - A, Document History