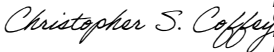




# NeuroNEXT Network

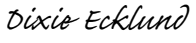

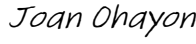
## Standard Operating Procedure (SOP) Corrective and Preventative Action Management Version 2.0 SOP NN QA 803

Originators: NeuroNEXT CCC and DCC Personnel

<b>Signature and Date:</b>  <small>Electronically signed by: Christopher S. Coffey Reason: I approve this document Date: Mar 8, 2024 07:59 CST</small>	08-Mar-2024
<b>Name and Title:</b> Christopher S. Coffey, PhD (DCC Principal Investigator)	
<b>Signature and Date:</b>  <small>Electronically signed by: Merit Cudkowicz Reason: I approve this document Date: Feb 22, 2024 17:46 CST</small>	22-Feb-2024
<b>Name and Title:</b> Merit E. Cudkowicz, MD MSc (CCC Principal Investigator)	
<b>Signature and Date:</b>  <small>Electronically signed by: Marianne Chase Reason: I approve this document Date: Feb 22, 2024 15:21 EST</small>	22-Feb-2024
<b>Name and Title:</b> Marianne Chase, BA (CCC Senior Director of Clinical Trials Operations)	

**NN QA 803**  
**NEURONEXT NETWORK STANDARD OPERATING PROCEDURE FOR**  
**CORRECTIVE AND PREVENTIVE ACTION PLAN MANAGEMENT**

SOP: NN QA 803 Version No: 2.0 Issue Date: 01Mar2024 Effective Date: 15Apr2024	Corrective and Preventive Action Plan Management	Supersedes Document Version : 1.0 Effective Date : 08Apr2023
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<b>Signature and Date:</b>  <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: left;">  <p><i>Dixie Ecklund</i></p> </div> <div style="text-align: left; font-size: small;"> <p>Electronically signed by: Dixie Ecklund            Reason: I approve this document            Date: Feb 24, 2024 17:13 CST</p> </div> <div style="text-align: right;"> <p>24-Feb-2024</p> </div> </div>	
<b>Name and Title:</b> Dixie J. Ecklund, RN MSN MBA (DCC Associate Director)	
<b>Signature and Date:</b>  <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: left;">  <p><i>Stacey Grabert</i></p> </div> <div style="text-align: left; font-size: small;"> <p>Electronically signed by: Stacey Grabert            Reason: I approve this document            Date: Feb 22, 2024 15:12 EST</p> </div> <div style="text-align: right;"> <p>22-Feb-2024</p> </div> </div>	
<b>Name and Title:</b> Stacey Grabert, Pharm.D, MS, (CCC Director of Quality Assurance)	
<b>Signature and Date:</b>  <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: left;">  <p><i>Joan Ohayon</i></p> </div> <div style="text-align: left; font-size: small;"> <p>Electronically signed by: Joan Ohayon            Reason: I approve this document            Date: Mar 11, 2024 11:15 EDT</p> </div> <div style="text-align: right;"> <p>11-Mar-2024</p> </div> </div>	
<b>Name and Title:</b> Joan Ohayon, RN, MSN, CRNP, MSCN (NINDS, NeuroNEXT Program Official)	

**NN QA 803**  
**NEURONEXT NETWORK STANDARD OPERATING PROCEDURE FOR**  
**CORRECTIVE AND PREVENTIVE ACTION PLAN MANAGEMENT**

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**1. POLICY**

The NeuroNEXT Data Coordinating Center (DCC) at the University of Iowa Clinical Trials Statistical and Data Management Center (CTSDMC) and Clinical Coordinating Center (CCC) at the Massachusetts General Hospital Neurology Clinical Research Institute (NCRI) will initiate the corrective and preventive action (CAPA) process in response to deviations and unexpected events that result in noncompliance with Network SOPs or federal regulations, have an impact on subject welfare and safety, and/or the integrity of the research data.

**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.

The NeuroNEXT Network adheres to a quality management system based on SOPs for key research-related processes. The purpose of this SOP is to provide guidance on the corrective and preventive action (CAPA) process to NeuroNEXT DCC and CCC for drafting a plan addressing existing or potential issues of noncompliance with NeuroNEXT SOPs or federal regulations identified during the conduct of research, and to prevent reoccurrence.

**3. ROLES AND RESPONSIBILITIES**

The CCC and/or DCC are responsible for identifying noncompliance with a NeuroNEXT SOP or federal regulations and determining if the CAPA process should be initiated and if immediate corrections need to be implemented.

Where applicable, the CCC Quality Assurance (QA) team will identify the individual(s) responsible for developing and implementing the CAPA plan, as well as training appropriate staff and evaluating the CAPA plan to determine/verify that is resolved the issue(s).

In the case of clinical trials sponsored by commercial sponsors, the Sponsor's SOPs may supersede this procedure, as appropriate, and will be documented to indicate as such. If a Sponsor's SOP is to be utilized and implemented by NeuroNEXT personnel, the SOP must be made available to the appropriate individuals for training and implementation.

**4. APPLICABLE REGULATIONS AND GUIDELINES**

- ICH GCP E6            2.13, 5.1.1
- FDA Regulations    21 CFR 820.100 and 21 CFR 211
- FDA Guidance        Guidance for Industry Investigator Responsibilities

**5. REFERENCES TO OTHER APPLICABLE SOPS**

This SOP applies to all NeuroNEXT Network SOPs and/or Sponsor SOPs as described in section 3 above

**6. ATTACHMENTS AND REFERENCES**

- NN QA 803 - A        Document History

**NN QA 803**  
**NEURONEXT NETWORK STANDARD OPERATING PROCEDURE FOR**  
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**7. TERMS AND ABBREVIATIONS**

The following terms and abbreviations are used in this document:

- CAPA Corrective and Preventive Action Plan
- 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 Practices
- ICH International Council for Harmonisation
- PPI Protocol Principal Investigator
- QA Quality Assurance
- RCA Root Cause Analysis
- SOP Standard Operating Procedure

**8. SPECIFIC PROCEDURES**

**A. Assess risk and make immediate corrections**

#	Who	Task	Attachment/ Reference	Related SOP
1.	CCC/DCC Personnel	Contact PPI, Sponsor, and/or Study Team, as appropriate and inform of noncompliance		NN PM 501
2.	CCC/DCC Personnel	Determine if the CAPA process should be initiated and if immediate corrections need to be implemented.		
3.	CCC/DCC Personnel	Identify the individual(s) responsible for: <ul style="list-style-type: none"> <li>- Implementing immediate corrections</li> <li>- Developing the CAPA plan</li> <li>- Implementing the CAPA plan</li> <li>- Training staff on the CAPA plan</li> <li>- Evaluating results of the CAPA plan</li> </ul>		
4.	CCC/DCC Personnel	Make immediate corrections to resolve the issue, if necessary		

**NN QA 803**  
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**B. Perform root cause analysis and develop CAPA**

#	Who	Task	Attachment/ Reference	Related SOP
1.	CCC/DCC Personnel	Perform a root cause analysis and document findings		
2.	CCC/DCC Personnel	Develop and document a CAPA plan to identify the actions needed to correct and prevent issue		
3.	CCC/DCC Personnel	Send a copy of the final CAPA plan to the PPI or designee for review and approval		
4.	PPI or designee	Review and approve CAPA		
5.	CCC/DCC Personnel	Develop or modify processes/ procedures, SOPs to address the root cause of the issue		
6.	CCC/DCC Personnel	Communicate CAPA plan and changes to the processes/procedures, SOPs to those affected		
7.	CCC/DCC Personnel	Train study staff on CAPA plan and new/revised SOPs, and training documents		

**C. Effectiveness check**

#	Who	Task	Attachment/ Reference	Related SOP
1.	CCC/DCC Personnel	Evaluate CAPA to determine/verify that the CAPA plan resolved the issue		
2.	CCC/DCC Personnel	If the CAPA plan did not address the root case, amend the plan, and re-evaluate		
3.	CCC/DCC Personnel	Document closure of the CAPA and file it in the appropriate location		

**NN QA 803**  
**NEURONEXT NETWORK STANDARD OPERATING PROCEDURE FOR**  
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**Attachment NN QA 803 - A. Document History**

NeuroNEXT Network Standard Operating Procedure (SOP)					
CAPA Management					
SOP NN QA 803					
Version	Description of Modification	Reason or Justification for Modification	Issue Date	Effective Date	Reviewer(s)
1.0	New	N/A	22Feb2023	08Apr2023	Catherine Gladden
2.0	Added "noncompliance to federal regulations" to sections 1, 2, 3	Periodic Review	01Mar2024	15Apr2024	Preeti Paul










# NN QA 803 CAPA Mangement v2.0 clean

Final Audit Report

2024-03-11

Created:	2024-02-22
By:	Tania Leeder (tleeder@mgb.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAnDNrTvspV0csqTQBfg21r6y58BEEdl_XQ
Number of Documents:	1
Document page count:	6
Number of supporting files:	0
Supporting files page count:	0

## "NN QA 803 CAPA Mangement v2.0 clean" History

-  Document created by Tania Leeder (tleeder@mgb.org)  
2024-02-22 - 7:55:31 PM GMT
-  Document emailed to christopher-coffey@uiowa.edu for signature  
2024-02-22 - 7:57:22 PM GMT
-  Document emailed to cudkowicz.merit@mgh.harvard.edu for signature  
2024-02-22 - 7:57:22 PM GMT
-  Document emailed to Marianne Chase (mchase@mgh.harvard.edu) for signature  
2024-02-22 - 7:57:22 PM GMT
-  Document emailed to dixie-ecklund@uiowa.edu for signature  
2024-02-22 - 7:57:22 PM GMT
-  Document emailed to Stacey Grabert (SGrabert@mgh.harvard.edu) for signature  
2024-02-22 - 7:57:22 PM GMT
-  Document emailed to ohayonj@ninds.nih.gov for signature  
2024-02-22 - 7:57:22 PM GMT
-  Stacey Grabert (SGrabert@mgh.harvard.edu) authenticated with Adobe Acrobat Sign.  
Challenge: The user opened the agreement.  
2024-02-22 - 8:12:25 PM GMT
-  Document e-signed by Stacey Grabert (SGrabert@mgh.harvard.edu)  
Signing reason: I approve this document

Signature Date: 2024-02-22 - 8:12:36 PM GMT - Time Source: server

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

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2024-02-22 - 8:20:56 PM GMT

📄 Document e-signed by Marianne Chase (mchase@mgh.harvard.edu)

Signing reason: I approve this document

Signature Date: 2024-02-22 - 8:21:07 PM GMT - Time Source: server

📧 Email viewed by christopher-coffey@uiowa.edu

2024-02-22 - 8:56:39 PM GMT

📧 Email viewed by cudkowicz.merit@mgh.harvard.edu

2024-02-22 - 11:46:17 PM GMT

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

Challenge: The user opened the agreement.

2024-02-22 - 11:46:31 PM GMT

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

2024-02-22 - 11:46:42 PM GMT

📄 Document e-signed by Merit Cudkowicz (cudkowicz.merit@mgh.harvard.edu)

Signing reason: I approve this document

Signature Date: 2024-02-22 - 11:46:44 PM GMT - Time Source: server

📄 Tania Leeder (tleeder@mgb.org) added alternate signer cscoffey@iowa.uiowa.edu. The original signer christopher-coffey@uiowa.edu can still sign.

2024-02-23 - 6:57:37 PM GMT

✉ Document emailed to cscoffey@iowa.uiowa.edu for signature

2024-02-23 - 6:57:38 PM GMT

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

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✉ Document emailed to ecklundd@uiowa.edu for signature

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2024-02-23 - 7:14:12 PM GMT

📧 Email viewed by ecklundd@uiowa.edu

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



✔ ecklundd@uiowa.edu authenticated with Adobe Acrobat Sign.

Challenge: The user opened the agreement.

2024-02-24 - 11:13:36 PM GMT

📄 Signer ecklundd@uiowa.edu entered name at signing as Dixie Ecklund

2024-02-24 - 11:13:52 PM GMT

📄 Document e-signed by Dixie Ecklund (ecklundd@uiowa.edu)

Signing reason: I approve this document

Signature Date: 2024-02-24 - 11:13:54 PM GMT - Time Source: server

📄 Email viewed by cscoffey@iowa.uiowa.edu

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

✔ cscoffey@iowa.uiowa.edu authenticated with Adobe Acrobat Sign.

Challenge: The user opened the agreement.

2024-03-08 - 1:59:23 PM GMT

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

2024-03-08 - 1:59:41 PM GMT- IP address: 128.255.113.139

📄 Document e-signed by Christopher S. Coffey (cscoffey@iowa.uiowa.edu)

Signing reason: I approve this document

Signature Date: 2024-03-08 - 1:59:44 PM GMT - Time Source: server- IP address: 128.255.113.139

📄 Email viewed by ohayonj@ninds.nih.gov

2024-03-11 - 3:14:37 PM GMT- IP address: 104.47.64.254

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

Challenge: The user opened the agreement.

2024-03-11 - 3:14:46 PM GMT

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

2024-03-11 - 3:14:59 PM GMT- IP address: 72.83.187.43

📄 Document e-signed by Joan Ohayon (ohayonj@ninds.nih.gov)

Signing reason: I approve this document

Signature Date: 2024-03-11 - 3:15:01 PM GMT - Time Source: server- IP address: 72.83.187.43

✔ Agreement completed.

2024-03-11 - 3:15:01 PM GMT