SECTION: RESEARCH
AREA: SPONSORED RESEARCH ADMINISTRATION
SUBJECT: REVIEW AND APPROVAL OF UAMS CLINICAL RESEARCH

PURPOSE

To establish the review and approval process for Clinical Research at the University of Arkansas for Medical Sciences ("UAMS") and to provide an accurate and consistent mechanism to track expenditures and payments received from Clinical Research sponsors in order to ensure that procedures required by each Clinical Research protocol are charged appropriately.

SCOPE

This policy applies to all persons conducting or involved in Clinical Research that involves any of the following:

(a) UAMS faculty, staff or students;
(b) UAMS owned assets (*e.g.*, facilities, equipment and property);
(c) Clinical services provided by UAMS; or
(d) Research grants, contracts or agreements awarded to or subject to the control of UAMS.

The policy does not apply to Research administered through the Biomedical Research Foundation at the Central Arkansas Veterans Healthcare Administration. This policy does not apply to the Arkansas Children's Hospital Research Institute.

ABBREVIATIONS AND DEFINITIONS

Abbreviations

1. **FDA:** United States Food and Drug Administration
2. **CTO:** Clinical Trials Office (Cancer Institute)
3. **GCP:** Good Clinical Practices
4. **ICH:** International Council on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use
5. **IDE:** Investigational Device Exemption
6. **IIT:** Investigator-Initiated Trial
7. **IND:** Investigational New Drug (Application)
8. **IRB:** Institutional Review Board
9. **ORRA:** Office of Research Regulatory Affairs
10. **SOP:** Standard Operating Procedure
11. **TRI:** Translational Research Institute

Definitions:

Clinical Research is defined as any investigation involving one or more Human Subjects whether using fully de-identified data or not that meets the definition of Research.

Clinical Research where the IND or IDE is held by the Industry Sponsor is Clinical Research involving Human Subjects that is conducted under an Investigational New Drug ("IND") application or Investigational Device Exemption ("IDE"), regulated by the United States Food and Drug Administration ("FDA"), funded by a pharmaceutical, drug/biological, or Device manufacturer, and subject to formal external monitoring by the sponsor or a designee (*e.g.*, a Contract Research Organization or Site Management Organization). The industry sponsor accepts the role of "sponsorship" as defined by FDA or International Council for Harmonisation ("ICH") Good Clinical Practice ("GCP") guidelines.

Clinical Research where the IND or IDE is held by UAMS is Clinical Research involving Human Subjects that is conducted under an IND application or IDE, regulated by the FDA, that may or may not be funded in part or whole by a pharmaceutical, drug/biological, or Device manufacturer, but does not meet other criteria for "industry sponsorship." The manufacturer does not accept the role of "sponsorship" as defined by FDA or ICH GCP guidelines.

Clinical Trial is Clinical Research involving Human Subjects that is carried out to discover or verify the safety and/or effectiveness of a diagnostic or preventative test/procedure, treatment, treatment regimen, or other intervention on the course, outcome, or other aspect of a medical condition or disease process. The treatment may be a drug, a multiple drug regimen, a Device, a biological, radiation therapy, surgery, or any other intervention or procedure.

Device - Section 201(h) of the FD&C Act (21 USC 321(h)) provides that the term "Device" is defined as: an instrument, apparatus, implement, machine, contrivance, implant, in vitro reagent, or other similar or related article, including any component, part, or accessory, which is:

(1) recognized in the official National Formulary, or the United States Pharmacopeia, or any supplement to them,
(2) intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment, or prevention of disease, in man or other animals, or
(3) intended to affect the structure or any function of the body of man or other animals, and which does not achieve its primary intended purposes through chemical action within or on the body of man or other animals and which is not dependent upon being metabolized for the achievement of its primary intended purposes.
    a. Exempt Device – a Device that meets the requirements of 21 CFR 812.2(c)
    b. Non-Significant Risk Device – a Device that does not meet the specifications for a Significant Risk Device, Device is not banned and investigation cannot be exempted.
    c. Significant Risk Device – an investigational Device that:
        i. Is intended as an implant and presents a potential for serious risk to the health, safety, or welfare of a subject;
        ii. Is purported or represented to be for a use in supporting or sustaining human life and presents a potential for serious risk to the health, safety, or welfare of a subject;

iii. Is for a use of substantial importance in diagnosing, curing, mitigating, or treating disease, or otherwise preventing impairment of human health and presents a serious risk to the health, safety, or welfare of a subject; or
iv. Otherwise presents a potential for serious risk to the health safety, or welfare of a subject.

Human Subject is defined as an individual who becomes a participant in research.

Investigator-Initiated Trial shall mean Clinical Research in which the Investigator conceives the research plan and develops the protocol, and the investigation is sponsored by an independent Investigator or academic sponsor.

Phase I Clinical Trials are defined by the FDA as the initial introduction of an investigational new drug into humans. The studies are designed to determine the metabolic and pharmacological actions of the drug in humans, the side effects associated with increasing doses, and, if possible, to gain early evidence of effectiveness. During Phase I studies, sufficient information about the drug's pharmacokinetics and pharmacological effects should be obtained to permit the design of well-controlled, scientifically valid, Phase II studies. The total number of subjects included in a Phase I study varies with the drug but is generally in the range of twenty to eighty.

Phase II Clinical Trials include the early controlled clinical studies conducted to obtain some preliminary data on the effectiveness of the drug for a particular indication or indications in patients with the disease or condition. Phase II studies are typically well-controlled, closely monitored, and conducted in a relatively small number of patients (usually involving several hundred people if feasible).

Phase III Clinical Trials are expanded controlled or uncontrolled trials performed after preliminary evidence from Phase II trials suggests that a drug is effective. The purpose of these studies is to gather additional information about effectiveness and safety that is needed to evaluate the overall risk-benefit relationship of a drug. Phase III studies typically involve several hundred to several thousand people.

Phase IV Clinical Trials are studies done on an approved drug or approved or cleared Device for the approved indication. These studies can be required by the FDA or can be initiated to study some particular parameter of the drug or Device.

Principal Investigator ("PI") is defined as the person responsible for the conduct of the study. A Clinical Research study is often conducted by a team of individuals at an investigative site. In this case, the Investigator is the responsible leader of the team and may be called the PI.

Research is defined as any systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge.

UAMS Clinical Research is Clinical Research that involves any of the following:
(a) UAMS faculty, staff or students;
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(c) Clinical services provided by UAMS; or
(d) Research grants, contracts or agreements awarded to or subject to the control of UAMS.

POLICY

1. All UAMS Clinical Research must be submitted to and reviewed by the Translational Research Institute ("TRI") or the Clinical Trials Office ("CTO"), as applicable. The TRI or CTO shall facilitate the review process by assisting the PI in preparing and finalizing required documents before Institutional Review Board ("IRB") review. All non-cancer Clinical Research protocols must be submitted to and reviewed by TRI.
2. No UAMS Clinical Trials or Clinical Research (non-cancer only) may be submitted to the IRB prior to TRI or Cancer Institute review and approval.
3. All UAMS Investigator-Initiated Trials ("IITs") that may require an IND or IDE shall be reviewed by the UAMS Office of Research Regulatory Affairs ("ORRA") for guidance before submitting to the IRB.
4. UAMS will be the sponsor, as defined by the FDA, and hold the IND or IDE for all UAMS IITs that require an IND or IDE, in accordance with Administrative Guide policies 16.1.10 and 16.1.11. Clinical Research involving multi-site studies where UAMS will be the sponsor and hold the IND or IDE shall be conducted in accordance with Administrative Guide policy 16.1.17.
5. No Clinical Research may be conducted without funding for all direct costs associated with the project. Funding may be internal or external. External funding sources for Clinical Research must provide indirect costs unless indirect costs are waived or reduced by the Vice Chancellor of Research and Innovation. TRI or CTO will review studies to ensure sufficient funding is provided for direct and indirect costs.
6. Clinical Research that does not include clinical services shall be reviewed and designated as billing exempt.
7. The TRI or Cancer Institute, as applicable, will only approve Clinical Research for IRB review after first assuring that:
   (a) the Clinical Research protocol is complete, proper in form, consistent with applicable regulations and appropriate for consideration by the IRB
   (b) the Clinical Research informed consent form or a waiver of consent is complete, in appropriate form, consistent with applicable regulations, the Clinical Research protocol, any applicable clinical trial agreement or notice of grant award, and appropriate for review by the IRB;
   (c) there is a coverage analysis and budget for insurance/federal payors (*e.g.*, Medicare, Medicaid, etc.) for the services to be provided in a Clinical Trial;
   (d) there are sufficient funds and resources identified to cover all direct and indirect costs of the Clinical Research;
   (e) the Clinical Research budget is accurate, is in accordance with UAMS billing policies and is sufficient to cover all costs;
   (f) the regulatory requirements applicable to the Clinical Trial are appropriately developed;
   (g) ORRA has reviewed the protocol and informed consent form to ensure that language contained in these documents complies with relevant IND or IDE regulations, if applicable;

(h) Clinical Trials involving an investigational Device conducted by an Investigator who is a faculty member, student, or employee of UAMS have been evaluated by ORRA for initial risk determination, which will then be provided to IRB;
(i) any clinical trial agreement or other sponsor agreement for the Clinical Trial is consistent with University policies, applicable state and federal law, and appropriate to address all issues described in this policy; and
(j) the Clinical Trial is appropriately established and prepared to be in compliance with all applicable Federal and State laws to include all Medicare, Medicaid and other federal programs' billing regulations.

PROCEDURE

1. Review of Clinical Trials/Research is initiated by the electronic submission of the following:
   (a) CLARA submission form,
   (b) the Clinical Research protocol, which will set forth the types and frequency of tests, procedures, and services,
   (c) the Clinical Trial informed consent form, which must delineate financial responsibility for the tests, procedures, and services associated with the Clinical Trial ,
   (d) the Clinical Research budget which must address all direct and indirect costs, and
   (e) a copy of any proposed clinical trial agreement or other sponsorship arrangement, if applicable.
2. The TRI or CTO will work with Investigators and sponsors (including ORRA, if applicable) to ensure complete documentation is obtained for review and approval. If assisting to develop study documents, the TRI or CTO may seek assistance from specialists in other departments, as needed.
3. The TRI or CTO will coordinate coverage analysis and budget development, and consistency between the budget, contract, and informed consent form language.
4. Upon achieving consistency between documents, the Clinical Trial/Research will be forwarded through CLARA to the following for approval and sign-off: the PI, hospital administration (the hospital Chief Administration Officer or their appointed designee), the department chair, and the Dean. [Review and approval by these parties is to ensure that sufficient funds are available to cover the direct and indirect costs of the research.]
5. If the Clinical Trial/Research is not approved at a step in #4, the TRI or CTO will document the reasons why it was not approved and will indicate, where possible, corrective measures to rehabilitate the proposal for possible resubmission. The TRI or CTO may assist in any corrective measures for future review and approval.
6. A PI may request reconsideration of any disapproval and submit additional information in support of his/her request to the Vice Chancellor for Research and Innovation for a decision.
7. Upon approval and sign-off by the necessary UAMS officials, the TRI or CTO will submit the Clinical Trial/Research to the IRB for review and approval. Clinical Trials/Research submitted to the IRB will have the following items, as necessary:
   (a) date and version number of approved protocol,
   (b) date and version number of approved consent form,
   (c) for industry sponsored Clinical Trials/Research, specific acknowledgment that the subject injury language in the consent form does not conflict with the contractual language, and

(d) for Clinical Trials/Research where the IND or IDE is held by UAMS or for Clinical Trials/Research where no IND or IDE is required, a Regulatory Analysis Determination Statement from ORRA will be added to study History in CLARA.

8. Final Clinical Trial and other Clinical Research agreements and applicable informed consent forms must include legal review by UAMS Office of General Counsel.
9. Approved documents will be submitted in CLARA.

Signature:  **Date:** **December 22, 2025**