The Role of the CRC in a Clinical Trial

Dr Saurendra Das
Country Head & Director of Operations, Excel Life Sciences

The team conducting a clinical trial at a site consists of the principal investigator (PI), the co-investigators, and the clinical research coordinators (CRCs). Each person in the team has a key role to play. This site team is supported by the sponsors and contract research organization (CRO) teams.

The US Food and Drug Administration (FDA)[1] and the international guidelines for Good Clinical Practice (GCP)[2] and several other guidelines clearly define the roles and responsibilities of the investigators, sponsors, and monitors. However, very little formal description is available about the critical role played by the CRC.

The Vital Link

The CRC is a vital link between the research subjects and their family, the investigator, and other site team members. They are also the liaison between the Sponsor, CRO, SMO, Central laboratory, Courier, the Institutional Review Board (IRB), and other players involved in the trial.

[1] Department of Health and Human Service: Investigational New Drug Application. Responsibilities of Sponsors and Investigators, 21 Code of Federal Regulations 312.50–312.70. Revised as of April 1, 2003.
[2] The European Agency for the Evaluation of Medicinal Products, ICH Topic E 6. Guideline for Good Clinical Practice. Note for Guidance on Good Clinical Practice (CPMP/ICH/135/95)

Only recently have research professionals realized the need for having a trained research coordinator at the site. Because of an increase in the number of clinical trials and the need for complicated and data intensive research, many sponsors today are reluctant to place a trial at a site that does not have a trained CRC to work along with the investigator.

Whether they are called ‘research coordinators’, ‘site coordinators’, or ‘clinical research coordinators’, such individuals play a central role in the smooth and accurate conduct of the clinical trial.

RESPONSIBILITIES OF CRCs

CRCs work in a team under the direct supervision of the PIs. CRCs usually have to handle multiple responsibilities.

The responsibilities of a CRC can be broadly categorized as:

- General responsibilities
- Trial specific responsibilities

General Responsibilities

- **Capacity Building**

The work of the CRC begins the day he/she joins employment, whether or not the sponsor has selected an investigative site for any particular trial. The CRC ensures that the potential pool of potential Investigators and Sites keep

increasing. The CRC is always on the lookout for new trial sites with Investigators who are research naïve.

They conduct an in-depth survey of the new sites to assess:

- Manpower presence and competence
- Support staff and constant support
- Infrastructure
- Presence of a functional Ethics Committee
- Compatible management
- Major diseases – incidence and prevalence rates

They analyze the data and share it with the Sales team of the organization. This helps in leveraging the sales calls and sealing off more trial projects in less time. This collection of data also helps in determining the number of sites to be undertaken for a particular trial to ensure timely fulfillment of target.

- **Training new CRCs**

Experienced CRCs are an asset and often are the best persons to hand-hold and train the newcomers in the field of clinical research. The training may include conducting feasibility studies, designing trial documents, setting up of sites, conduct of the trial and trial closeout. Another important training module is the soft skill and managerial skills.

Trial - related Responsibilities

- **Site Identification**

A key responsibility of the CRC is to identify the right site for the trial – one that fulfills all the criteria set forth by the clinical trial guidelines and trial protocol. A CRC who has worked at a particular site earlier is often the best judge to identify the site for another trial. Having worked at a site for over a period of time, the CRC understands the needs, expectations, and the potential of the site. He/she knows how the site can function to its optimum.

What if the CRC does not have prior experience at the site? Well, in such cases, a more in-depth scrutiny of the site is required before finalizing it for any trial. There are several factors that need to be considered when identifying a suitable site for a trial.

- Reputation of the investigator in the particular therapeutic area. Such information can be collected based on peer views, references, publications, and previous experience in clinical trials
- Assess the site infrastructure to find out about availability of space, equipment, trained manpower to handle particular equipment, ancillary facilities such as laboratories, pharmacy etc, and communication facilities.
- The Ethics Committee/ IRB play a key role in the conduct of the trial. It must be ensured that the site has an IRB that works according the ICH GCP and other applicable guidelines. The following information needs to be collected from the IRB:

        - Presence of written SOP
        - Membership list
        - Submission requirements
        - Financial requirements for submission
        - Turn around time for the approval of the protocol
    - Evaluate the site's access to the appropriate subject population – whether the required number of subjects can be enrolled within the stipulated time.
    - The sponsor, the auditor, and the trial inspector may need to visit the site during the trial. Therefore, check the location and access to proper transport and communication at the site.

- **Pretrial Documentation**

A CRC has to collect the updated and signed resume of each member of the site team. He/She must ensure that the following pretrial documents are completed within the specified timeline:

    - Form 1572
    - Financial Disclosure Form
    - Undertaking from the PI
    - Confidentiality Non-Disclosure Agreement

- **Coordinating with the IRB**

You can actively follow up through the site team with the IRB for a faster approval of the trial. You will also look into the timely submission of all the safety reports and the amendments of the trial documents to the IRB.

- **Financial Responsibilities**

Sometimes a senior CRC may be empowered to negotiate the trial budgets at the site. This includes the investigator fees, the IRB fees, the site administration fees, laboratory costs, study subject travel and other reimbursements.

Track the trial on a routine basis. Inform the concerned personnel on reaching specific milestones. All milestone-related payments will be followed up by you.

- **Training the Site Staff**

The CRC must be ready to train the site staff on a regular basis throughout the trial. He/she can highlight on:

  - Inclusion criteria
  - Exclusion criteria
  - Schedule of visits
  - Window period
  - Visit specific activities
  - Safety guidelines and reporting timelines as per the protocol

- **Investigators' Meeting and Site Initiation Visits**

The CRC may be in charge of conducting the entire investigators' meeting for the trial. They also have to ensure that all the requirements are in place for the site initiation visit.

- **Informed Consent Forms**

The CRC ensures that the informed consent form sent by the sponsor is translated and back-translated into the local language as advised by the investigator.

- **Patient recruitment and follow up**

During the subject enrollment, he/she ensures that all queries are clarified up to the subjects' satisfaction and that the ICF is administered by the Investigator as per the ICH GCP guidelines.

These individuals ensure that the enrolled study subjects are informed about their schedule of visits well in advance and that they do not miss their visits. They collect and organize subject data and disseminate the information to the sponsor on time.

- **Research Pharmacy, Drug Accountability, and Laboratory Responsibilities**

The CRC also have to manage the storage of the study drug - account for study drug received from sponsor, distributed to the patient, returned from the patient and finally back to the sponsor.

They ensure that all laboratory specimens such as blood, urine, tissue etc are properly labeled, packaged and stored before shipment to the central lab. They even coordinate with the central lab on a regular basis for the timely receipt of the reports.

- **Amendments**

They follow up with the sponsor for any amendments in the study protocol or the ICF and ensure that the amended versions are implemented at the site only after the favorable written approval by the IRB.

- **Post-trial activities**

Once the hospital phase of the trial is over, completing the study documentation will become the key focus[3]. They do a final check of the case report forms (CRFs), maintain an archival inventory of records and CRFs in a secure place and coordinate the close out visits.

The job of the CRC involves a wide range of activities. They manage the research study – the study startup, regulatory activities, and the data. They oversee the daily operations of the trial including handling the finances and communicating with the investigators and the sponsors. As they gain experience they may also assist with the budget preparation and preparation of proposals and essential documents. And they finally ascend the hierarchal ladder to the post of a Team Lead or even a Project Manager – the steps to these successes are multi tasking, professionalism, sincerity and hard work.

[3] Lenoble, Eveline. Nurses in Clinical Trials. Nursing BC. Feb 2000. FindArticles.com. 27 Nov. 2007. http://findarticles.com/p/articles/mi_qa3916/is_200002/ai_n8898825