Class is meant to *supplement* other training, not as all inclusive training. This session will *not* be recorded, but this PowerPoint can found:

https://medschool.ucla.edu/research/research-infrastructure/administrative-support/department-of-medicine-office of-research/fund-management-training

# Introduction to Clinical Trials Budgeting, Billing & Financial Management

UCLA DEPARTMENT OF MEDICINE
OFFICE OF RESEARCH ADMINISTRATION
ZOOM TRAINING

#### Summary

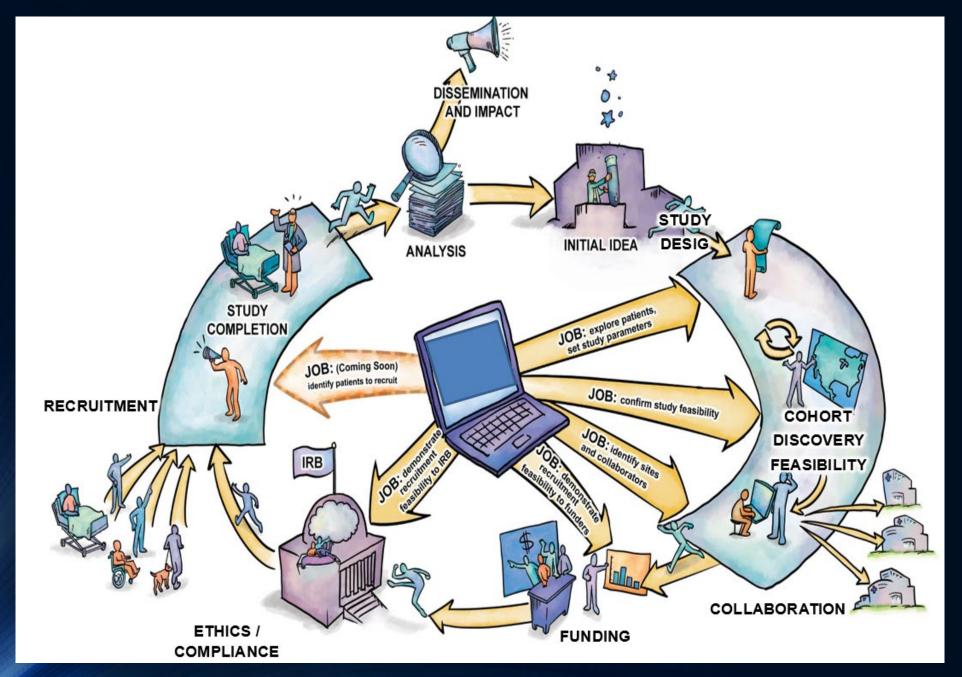
- Introduction to Clinical Trials (CT)
  - Description & flow
  - Contract Office contacts
  - Key terminology & acronyms
- Budgeting, Billing & Financial Management of a CT
  - Financial lifecycle
  - CT Start-Up process / Pre-Award
  - Financial Management Charge Review
  - CT Close-Out process

### Introduction

CLINICAL TRIALS

#### Clinical Trial - Description

- Clinical trials are experiments designed to evaluate new interventions to prevent or treat disease in humans. The interventions evaluated can be drugs, devices (e.g., hearing aid), surgeries, behavioral interventions (e.g., smoking cessation program), community health programs (e.g. cancer screening programs) or health delivery systems (e.g., special care units for hospital admissions).
- Results from randomized clinical trials are usually considered the highest level of evidence for determining whether a treatment is effective because trials incorporates features to ensure that evaluation of the benefits and risks of treatments are objective and unbiased. The FDA requires that drugs or biologics (e.g., vaccines) are shown to be effective in clinical trials before they can be sold in the US.



#### Roles

- Principal Investigator
- Study Team
- Fund Manager
- Clinical Trial Program

Principal Investigator (PI)

> Analyze Data and Report results of the Trial or Grant Research

Ensure Regulatory and Study Objectives are met

**Budget Review** 

Attestation at Close Out

Study Team (ST)

Provide study support to PI

Study Training

Regulatory/Patie nt Interaction

Data Management

Review Patient Care Expenses with Charge Reviewer Fund Manager (FM)

> Provide Administrative Support to Pl

Provide Support on Contract and Budget Inquiries

Financial Management

Account Reconciliation & Closeout Department Clinical Trial Program (CTP)

> Financial & Study Team Support / Training

Budget Development/N egotiation

Payment Terms

Financial Administration

#### UCLA Central Pre-Award Offices

- FOR-PROFIT/INDUSTRY SPONSOR → CTC&SR or TDG
  - Clinical Trials only <u>Clinical Trials Contracts & Strategic Relations (CTC&SR)</u>
  - Research Contracts & Grants (excluding Clinical Trials) <u>Technology Development Group</u> (<u>TDG</u>)
- NON-PROFIT SPONSOR → OCGA
  - Contracts OCGA Officer
  - Grants & Cooperative Agreements OCGA Analyst
  - Clinical Trials OCGA Analyst or OCGA Officer
  - Grants.gov Grants/S2S < \$500K DOM DRA (DOM only)</li>

		Grants	
		Cooperative	
Sponsors Types	Contracts	Agreements	Clinical Trials
Non-Profit	OCGA / DOM DRA*	OCGA / DOM DRA*	OCGA
For-Profit/Industry	TDG	TDG	CTC&SR

<sup>\*</sup> for grants.gov applications < \$500,000 DC/year, except Ts (training) and F (fellowship) series

#### UCLA Central Pre-Award Offices & Contacts

- Clinical Trial, Contracts and Strategic Relations (CTC&SR)
  - CTC&SR Intake Team <u>clinicaltrials@mednet.ucla.edu</u>
  - Purpose: Negotiate agreements such as confidentiality agreements (CDA) related to clinical trials and clinical trial agreements (CTA) for industry supported drug, biological and medical device trials, and is the authorized institutional signatory for these agreements. <u>FOR PROFIT</u> pharmaceutical, biomedical and medical device manufactures as well as contract research organizations (CRO). In addition, CTC&SR negotiates CDAs and CTAs with non-profits that flow through Industry funding: New, Amended and No Cost Time Extension on contracts. Also send Internal Documents. Email should include PATS# (if assigned), PI, sponsor & protocol name.

#### UCLA Central Pre-Award Offices & Contacts

- Technology Development Group (TDG)
  - DOM contacts
    - Non-HemOnc: Tara Davidoff (<u>Tara.Davidoff@tdq.ucla.edu</u>)
    - HemOnc: Karla Zepeda (<u>KZepeda@tdg.ucla.edu</u>)
  - Other department <u>TDG Contacts/Assignments</u>
  - Purpose: Industry supported basic and applied research, including material transfer agreements (MTA): New, Amended and No Cost Time Extension (NCTE) on contracts. The UCLA Technology Development Group (TDG) handles various agreements involving research funded at UCLA by FOR-PROFIT/INDUSTRY sponsors. If your research will involve interactions with and funding from industry sponsors, TDG Contract Officers will help with the process. Also send Internal Documents. Email should include PATS# (if assigned), PI, sponsor & protocol name.

#### UCLA Central Pre-Award Offices & Contacts

- Office of Contract & Grant Administration (OCGA)
  - OCGA Intake reach out directly to your OCGA Analyst or Officer <u>DOM Division</u> <u>Contacts/Assignments</u>
  - Purpose: Submission for extramurally funded research proposals to government, non-profit and higher education organizations for the purpose of research, service, training, clinical trials, and other sponsored activities. The review and approval and signing and/or submitting of all proposals to government, NON-PROFIT, and higher education organizations for extramural support on behalf of the University. This includes sponsored project activities, such as research, training, and public service.

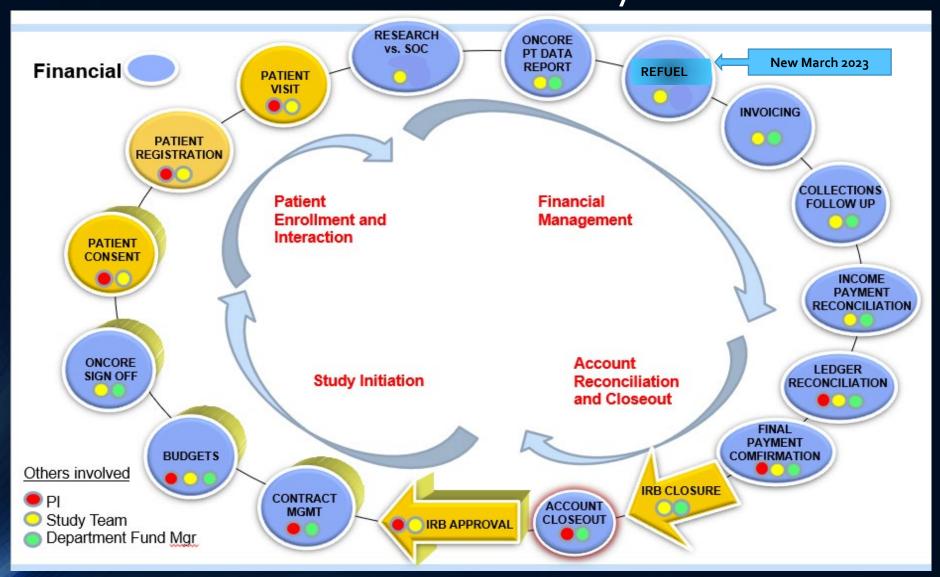
### CT Key Terminology & Acronyms

PI	Principle Investigator	FCA	Financial Coverage Analysis	SOC/RC	Standard of Care / Routine Care
CRC	Clinical Research Coordinator	RQ	Research Quality	P / INV	Pass through / Invoice Costs
FM	Fund Manager	CRO	Clinical Research Organization	SAE	Serious Adverse Events
REG	Regulatory	CRC	Clinical Research Coordinator	Industry	For Profit
RTR	Research Transaction Report (Billing)	SIV	Site Initiation Visit	Government	Non Profit
CTC&SR	Clinical Trial, Contracts and Strategic Relations	cov	Close-Out Visit	СТ	Clinical Trial
TDG	Technology Development Group	IRB	Institution Review Board	СТА	Clinical Trial Agreement
OCGA	Contract & Grant Officer Contacts	сс	Care Connect	СТР	Clinical Trial Program

# Budgeting, Billing & Financial Management

**CLINICAL TRIALS** 

### Clinical Trial - Financial Life Cycle



### Start-Up / Pre-Award

CLINICAL TRIALS

#### Required Documents for New/Amendment/NCTE

- Clinical Trial Intake
  - CT Application Checklist DOM
- Obtain IRB, Consent & Protocol from Regulatory or Start –up Contact
- Draft Clinical Trial Agreement (CTA) with proposed budget numbers, obtain from Regulatory or Start –up Contact
- Obtain sponsor contact information from Regulatory or Start –up Contact
- If PI opts to outsource services
  - DOM Clinical Trial Program (CTP) Service Menu and Application Form
  - Send your email request to (DOMCTP@mednet.ucla.edu)
  - CTSI Clinical Research Coordination Services & Education (CSE) List of Services
  - Send your email request to (StudyActivation@mednet.ucla.edu)

#### Organizations For-Profit vs Non-Profit

- For-Profit Clinical Study funded extramurally by a for-profit organization. For Profit entities able to generate profit and meet long-term obligations.
- Non-Profit Clinical Study funded extramurally by a governmental or non-profit organization, or internally funded through departmental/division funds, and/or other discretionary funds utilized by the PI (including but not limited to PI and staff time and effort used to conduct the Clinical Study).
- Despite their different approaches, for-profit and non-profit organizations share some financial reporting similarities, too. Both must carefully be tracked for all transactions; maintain supporting documentation; and produce accurate, timely financial statements.

#### Certified Budget

- Research Quality Certified Budget Sponsor / UCLA Worksheet
- UCLA Worksheet detailed Billing Grid/Matrix
  - Details all study events including patient procedures performed during each subject visit
  - It Drives where the service should be billed, who is financially responsible for the charge
  - Identifies each charge clearly as Third-Party (SOC or RC/RQ1) or Research (Sponsor Paid-S)
  - Billing Grid/Matrix should be used for each study participant as a roadmap to guide patient care charges
  - It serves as a vital tool when reconciling study charges

#### Captured Costs

#### Start-Up Costs

- PI and Team Effort Investigator meeting, Site selection visit, Site Initiation, etc.
- Administrative Fees
- Study training
- Regulatory Document Preparation
- IRB preparation & review

### Event Based (Invoiceable) Fees – as applicable

- Annual IRB Preparation and Review
- IRB Amendment Preparation and Review
- Safety Report Preparation and Review
- Adverse Event Reports submissions
- Advertising Fees
- Monitoring/Audit Visit Fees
- Subject Visit Invoiceables (i.e. pregnancy tests)

### What are considered "Routine Costs" (RC)?

#### Routine Costs – Billable to insurer

- Items or services that are typically provided absent a clinical trial (e.g., conventional care)
- Items or services required solely for the provision of the investigational item or service (e.g., administration of a noncovered chemotherapeutic agent), the clinically appropriate monitoring of the effects of the item or service, or the prevention of complications
- Items or services needed for reasonable and necessary care arising from the provision of an investigational item or service- in particular, for the diagnosis or treatment of complications.

#### Research-Only Costs –

Not Routine Care/Not Billable to insurer

- The investigational item or service itself
- Items and services provided solely to satisfy data collection and analysis needs and that are not used in the direct clinical management of the patient (e.g., monthly CT scans for a condition usually requiring only a single scan)
- Items and services customarily provided by the research sponsors free of charge for any enrollee in the trial

#### Evaluating the Sponsor Budget/Payment Terms

- Items for review:
  - Sponsor budget amount comparable to the UCLA internal budget per patient amount?
  - Who are Financial Coverage Analysis (FCA) what is their role? Policy 915
  - What is the initial payment/ start up?
  - What are the payment terms?
  - Is there a holdback for final payment?
  - Are hidden costs covered such as screen failure compensation, etc.?

### Negotiated Budget- <u>CT Budget Template</u>

Study Title:	Phase 2, R	andomized, Γ	Jouble-blin	nd, Placebr	J-controller	J. Parallel €	∋roup, Multi	center, to F	xplore the	Efficacy a	nd Safety c	A DRUG in T	Patients X	XXXX Dise	ase .								
Protocol Version: 2.0 December			1						tment Pha							1						.——	
ARM			1		$\overline{}$			,	, — ,			$\overline{}$	,—-	Cycle		End of	1		$\overline{}$	1	,	4	·   · · · ·
,	Screen	Bun in	Cycle 1	1 Cycle 1	Cycle 2	Cycle 3	Cycle 4	Cycle 5	Cycle 6	Cycle 7	[Cycle 8]	Cycle 9 C	Cycle 10	0 11 0	Cycle 12	2 Study	1	Fo <sup>t</sup>	llow -up	11	,		'
Visit	<u> </u>	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	1	17	18		IPD / IP		ļ <i>"</i>
Each cycle is 28 Days	Day -42	Day -35	₩k 0	Wk4	₩k8	Wk12	₩k16	₩k20	₩k24	₩k28	Wk32	Wk36	₩k40	Wk44	₩k48	₩k52	Total	₩k58	8 Wk64	dis	continua	Unschedu	a   7
,	to -35	1	1	1	1'	1	1	ı	ıJ	1	11		·	1	1	1	1	ı	·   "		tion visit	led Visit	
Staff Cost		4	4	4	4	4	4	ليب	ليب	·	4			المصيا		4	1 100		-1 100	جر 1	450		4
Principal Investigator	\$ 600														\$ 200			, in	100 \$ 100		150		
Study Coordintor	\$ 500														\$ 240				40 \$ 240		240		0 \$ 240
Data Manager	\$ 350	\$ 250	\$ 350	0 \$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 350	\$ 3,700	\$ 20	200 \$ 200	\$	200	\$ 200	0 \$ 200
Procedures/ Assessments				4							<b>—</b>												
	\$ 300		' ــــــــــــــــــــــــــــــــــــ	<u> </u>	<u> </u>	<u>'</u> ــــــــــــــــــــــــــــــــــــ	'ــــــــــــــــــــــــــــــــــ	ليبت	ليب	<u>'</u>	السلب	ليسا	اا	الليسا	الليسا	′	\$ 300						
Office Visit / Physical Examination		\$ 220	\$ 220	0 \$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	\$ 220	,	\$ 22	20 \$ 220	\$	220	\$ 220	0 \$ 220
Medical history	×	الصل	'ـــــــــــــــــــــــــــــــــــــ	'	'ـــــــــــــــــــــــــــــــــــــ	'ـــــــــــــــــــــــــــــــــــــ	'ـــــــــــــــــــــــــــــــــــــ	لــــــــــــــــــــــــــــــــــــــ	لــــــــــــــــــــــــــــــــــــــ	·	السلب		السلك	لسسك	الست		\$ -						
Concomitant Medications	×	×	X	X	X	X	X	X	X	X	X	Х	X	X	X	X	\$ -	X			Х	·	
Adverse Events	X	×	X	X	X	X	X	X	X	X	X	X	X	X	X	X	\$ -	X			X		
Vital Signs	×	×	X	X	X	X	X	X	X	X	X	X	X	X	X	X	\$ -	X	×		X	×	×
Weight	×		X							·					4	X	\$ -		$\neg \neg \neg \neg$				
CAT	\$ 35		\$ 35			\$ 35			\$ 35		1	\$ 35			4	\$ 35			7	\$	35		
SGRQ		\$ 35				\$ 35			\$ 35			\$ 35			\$ 35		5 \$ 245		<del>                                     </del>	\$	35	4	<b>T</b>
ePRO Compliance Check		\$ 35				\$ 35					4 35	\$ 35							+	\$	35		†
ePRO Home daily completion	$\overline{}$	1 × 3	X	X	X	X	<del>\\</del> X	-x	i 📉 x 🥒	X	X		×	X	X	X	\$ -		+		X	4	<del>                                     </del>
EKG	\$ 158		\$ 158			\$ 158			\$ 158				\$ 158		4	\$ 158			+ -	\$	158		\$ 158
Radiology - Imaging											4		<del></del>										
Professional Radiology Reading	I INVBL										4	4			4		\$ -		$\overline{T}$				T .
MRI/CT	INVBL		$\overline{}$	$\vdash$	$\overline{}$	<u> </u>	$\vdash$		<del></del>				·				* -		+ -				+ -
CD Media Storage	\$ 45		$\overline{}$	$\vdash$	$\overline{}$	$\overline{}$	$\vdash$	$\overline{}$		4- /			$\overline{}$	<del></del>	$\vdash$	$\overline{}$	\$ 45		+ -		<del></del>		+ 7
Laboratory - Local	*												$\overline{}$								-		
Lab Specimen Collection	I INVBL							$\overline{}$		_			$\overline{}$				T\$ -		<del></del>				
Tuberculosis	INVBL			+	$\overline{}$	$\overline{}$	$\vdash$	$\overline{}$	$\overline{}$	$\overline{}$	$\overline{}$	$\overline{}$	$\overline{}$	$\vdash$	$\overline{}$		\$ -		+ -		$\overline{}$		+
Pregnancy (Urine)	INVBL		INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	INVBL	+ -	INVBL	BL INVBL		<del></del>		+
FSH	INVBL		HAADE	1 114405	114405	114400	114405	- HAADE +		114400,	HAADE	- HAADE	( HAADE )	HAADE I	I HACEL	114405	+ -		-   ""		<del></del>		+
Laboratory – Central	, "4455"							$\rightarrow$			4		$\overline{}$										
Lab Specimen Collection	75	. —	\$ 75	5 \$ 75		\$ 75	4	$\overline{}$	\$ 75	_		\$ 75	$\overline{}$		\$ 75	. \$ 75	5 \$ 600	\$ 7	75 \$ 75	1 8	75		\$ 75
Lab Specimen Processing	50			0 \$ 50		\$ 50			\$ 50			\$ 50		$\vdash$	<del></del>		350		50 \$ 50		50		\$ 50
Study Drug /Device			4 33	4 33		* 35			<del>* • • • • • • • • • • • • • • • • • • •</del>			( )	$\overline{}$			* 55,	<u>/ *                                    </u>		30 ¥ 30,				1 *
Drug Dispensing Inj Fee	$\overline{}$		\$ 120	0 \$ 120	\$ 120	\$ 120	\$ 120	\$ 120	\$ 120	\$ 120	\$ 120	\$ 120	\$ 120	s 120	\$ 120		\$ 1,560		<del></del>				1
Drug Administration /Accountibility Inj	$\vdash$	$\qquad \qquad \vdash$	Ψ	1 1 1 1 1 1	+ IL-	* ""	+	* ***	( · · · · · · · · · · · · · · · · · · ·	* ",	+	* "	, <del>* ***</del>	φ ===+	Ψ ===+		1 "	4—	+ -		$\longrightarrow$		+
Fee (DRUG/Placebo)	1 '	1	\$ 272	2 8 272	2 \$ 272	\$ 272	2 \$ 272	Ls 272	\$ 272	Ls: 272	2 \$ 272	\$ 272	\$ 272	1 s 272 l	\$ 272	Л '	\$ 3,536	4	_ l		,	4	·   · · · ·
Miscellaneous			4	4	*	*	4	<del>*</del>	<del>*</del>	*	*	* -:-	<del>*</del>	4	*		1 0,000						
CTRC Room	\$ 185		\$ 300	0 \$ 300	\$ 185	\$ 185	5 \$ 185	\$ 185	\$ 185	\$ 185	5 \$ 185	\$ 185	\$ 185	\$ 185	\$ 185	\$ 185	5 \$ 3,005	\$ 30	800 \$ 300	1 8	300		\$ 300
CTRC Staff	\$ 110		\$ 110								3 \$ 110						\$ 1,650		110 \$ 110		110		\$ 110
Nutrition Nutrition	\$ 50		\$ 50								0 \$ 50								50 \$ 50		50		\$ 50
Parking	NVBL 1		1 NVBL				NVBL		NVBL									NVBI		<b>₩</b>	INVBL	INVBL	INVBL
Sub Total	\$ 2,678					-											_	\$ 1,34		┨┠┇		\$ 920	
Overhead 26%	\$ 2,678																	\$ 1,34		1 1 *		\$ 320 \$ 239	
Uverhead 26%. Total w/ overhead												\$ 475							50 \$ 350 95 \$ 1,695				3 <b>\$</b> 404
Anticipated enrollment 8	\$ 3,3141	, \$ 1,313 <sub>]</sub>	<u>, \$ 3,001</u> j	<u>  ¥ 2,355</u>	<u> </u> \$ 2,050 j	<u>, ¥ ∠,501)</u>	<u> 1 ¥ 2,050 j</u>	\$ 2,050 [	\$ Z,501]	\$ 2,050	* Z,050 j	<u>* Z,302 j</u>	\$ 2,255	<u>.</u> ¥ 2,050 j	<u>,</u> \$∠,155 j		f 8 patients	♦ 1,00	/5   \$ 1,000 j		2,000	¥ 1,100	¥ 1,551
•															J	_		1					
X: Cost included in budget																	\$240,592	1					
* / INVBL: Invoice to sponsor															J	Total Indire	e \$ 62,554	1					
																	1						

Q1/RC1: ROUTINE CARE >Invoiceables Schedule B Total Costs \$ 303,146

#### Negotiated Budget- Fixed Costs & Procedure Costs

#### Event Based / Invoiceable Fees

 Most typical budgets consist of per subject/per visit amount and various invoiceable items, often a mix of invoiceable clinical procedures and administrative and institutional costs

NON-REFUNDABLE FIXED COSTS FOR UCLA	Direct Costs	Indirect Costs	Total	Pagable
Study Approval Process: Application Preparation & Submission to: IRB, ISPRC, MRSC, CA and Pharmacy	\$ 9,000	\$ 2,340	\$ 11,340	Upon full execution of agreement
Site Initiation Visit: Time & Effort	\$ 1,500	\$ 390	\$ 1,890	Upon full execution of agreement
Mandatory UCLA IRB Fees	\$ 2,500		\$ 2,500	Upon full execution of agreement
Pharmacy Set-up Fees	\$ 3,000	\$ 780	\$ 3,780	Upon full execution of agreement
Pathology and Laboratory Medicine Set-Up Fee	\$ 4,000	\$ 1,040	\$ 5,040	Upon full execution of agreement
Radiology Set- Up Fee	\$ 750	\$ 195	\$ 945	Upon full execution of agreement
CTRC Set - up Fee	\$ 2,391	\$ 622	\$ 3,013	Upon full execution of agreement
Total Non-Refundable Fixed Costs			\$ 28,508	-
Items	Direct Costs	Indirect Costs	Total	Payable
Committee Annual Committee Renewals:	\$ 2,850	\$ 741	\$ 3,591	Annually upon invoice
Pharmacy Renewal Fees	\$ 1,500	\$ 390	\$ 1,890	Annually upon invoice
Protocol Amend/IB Amendment with ICF Changes	\$ 500	\$ 130		Upon submission of invoice
Informed Consent Form with Changes	\$ 630	\$ 164	\$ 794	Upon submission of invoice
Reconsent per participant	\$ 99	\$ 26	\$ 125	Upon submission of invoice
Pharmacy Monitoring Visit Fee: \$150/hr for first hour	\$ 150	\$ 39		Upon submission of invoice
Pharmacy Monitoring Visit Fee: \$125/hr, beyond 1st hour	\$ 125	\$ 33	\$ 158	
Pharmacy Protocol Updates per update	\$ 300	\$ 78	\$ 378	
Pharmacy Sponsor Requests for Additional Pharmacy Data after	\$ 1,650	\$ 429	\$ 2,079	Upon submission of invoice
Closeout Visit: Annual Maintenance Fee + Monitoring Fee				
ICF TRANSLATION"		ost Plus 26% Indirect (		Upon submission of invoice
Copying and Long Term Storage (per pt)	\$ 350			Upon submission of invoice
Pharmacy Close-Out Fee	\$ 500			Upon submission of invoice
Study Closure	\$ 500			Upon submission of invoice
Med Watch/IND/SAE Safety Report Submission per report	\$ 35	\$ 9	\$ 44	Upon submission of invoice
	ai Ca			
Procedures				
	Direct Costs	Indirect Costs	Total	Payable
Professional Radiology Reading Fee	\$ 390	\$ 101	\$ 491	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray	\$ 390 \$ 251	\$ 101 \$ 65	\$ 491 \$ 316	Upon submission of invoice Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen	\$ 390 \$ 251 \$ 669	\$ 101 \$ 65 \$ 174	\$ 491 \$ 316 \$ 843	Upon submission of invoice Upon submission of invoice Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest	\$ 390 \$ 251 \$ 669 \$ 667	\$ 101 \$ 65 \$ 174 \$ 173	\$ 491 \$ 316 \$ 843 \$ 840	Upon submission of invoice Upon submission of invoice Upon submission of invoice Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis	\$ 390 \$ 251 \$ 669 \$ 667 \$ 651	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MRI Abdomen	\$ 390 \$ 251 \$ 669 \$ 667 \$ 651 \$ 1,092	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MRI Abdomen MRI Pelvis	\$ 251 \$ 669 \$ 667 \$ 651 \$ 1,092 \$ 1,174	\$ 101 \$ 65 \$ 174 \$ 163 \$ 169 \$ 284 \$ 305	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MRI Abdomen	\$ 390 \$ 251 \$ 669 \$ 667 \$ 651 \$ 1,092	\$ 101 \$ 65 \$ 174 \$ 163 \$ 169 \$ 284 \$ 305	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Bay CT Pelvis MRI Abdomen MRI Pelvis CD Media Storage Fee (per disk)	\$ 330 \$ 251 \$ 663 \$ 651 \$ 1,032 \$ 1,174 \$ 45	\$ 101 \$ 65 \$ 174 \$ 169 \$ 284 \$ 305 \$ 12	\$ 491 \$ 316 \$ 843 \$ 840 \$ 920 \$ 1,376 \$ 1,479 \$ 57	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MRI Pelvis CD Media Storage Fee (per disk)	\$ 390 \$ 251 \$ 669 \$ 667 \$ 651 \$ 1,192 \$ 1,174 \$ 45	\$ 101 \$ 65 \$ 174 \$ 169 \$ 284 \$ 305 \$ 12	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MRI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Mise Audit Preparation Fee	\$ 330 \$ 251 \$ 663 \$ 651 \$ 1,032 \$ 1,174 \$ 45	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12 Indirect Costs \$ 260	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MRI Pelvis CD Media Storage Fee (per disk)	\$ 230 \$ 251 \$ 683 \$ 687 \$ 651 \$ 1,092 \$ 1,174 \$ 45 Direct Costs \$ 1,000	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12 Indirect Costs \$ 260	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MPI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-	\$ 230 \$ 251 \$ 683 \$ 687 \$ 651 \$ 1,092 \$ 1,174 \$ 45 Direct Costs \$ 1,000	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12 Indirect Costs \$ 260	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Pelvis MPI Abdomen MRI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Mise Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event	\$ 390 \$ 251 \$ 668 \$ 667 \$ 551 \$ 1,192 \$ 1,174 \$ 45 Direct Costs \$ 1,000 \$ 500	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12 Indirect Costs \$ 260 \$ 130	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57 Total \$ 1,260 \$ 630	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MRI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission	\$ 390 \$ 251 \$ 668 \$ 667 \$ 551 \$ 1,192 \$ 1,174 \$ 45 Direct Costs \$ 1,000 \$ 500	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12 Indirect Costs \$ 260 \$ 130	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57 Total \$ 1,260 \$ 630	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MPI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV	\$ 390. \$ 251 \$ 663 \$ 667 \$ 667 \$ 1,092 \$ 1,174 \$ 45  Direct Costs \$ 1,000 \$ 500 \$ 1,500	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12 Indirect Costs \$ 260 \$ 330	\$ 491 \$ 316 \$ 843 \$ 820 \$ 1,376 \$ 1,479 \$ 57 Total \$ 1,260 \$ 630 \$ 1,890	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Pelvis MPI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Mise Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV Staff Time and Effort (Regulatory Coordinator & Study	\$ 390. \$ 251 \$ 663 \$ 667 \$ 667 \$ 1,092 \$ 1,174 \$ 45  Direct Costs \$ 1,000 \$ 500 \$ 1,500	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12 Indirect Costs \$ 260 \$ 330	\$ 491 \$ 316 \$ 843 \$ 820 \$ 1,376 \$ 1,479 \$ 57 Total \$ 1,260 \$ 630 \$ 1,890	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Mise Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process	\$ 390 \$ 251 \$ 668 \$ 667 \$ 551 \$ 1,192 \$ 1,174 \$ 45 Direct Costs \$ 1,500 \$ 1,500 \$ 450 \$ 450	\$ 101  \$ 65  \$ 174  \$ 173  \$ 169  \$ 284  \$ 305  \$ 12   <b>Indirect Costs</b>  \$ 260  \$ 130  \$ 390  \$ 177  \$ 78	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57  Total \$ 1,260 \$ 1,890 \$ 378	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MRI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Survival Follow-up, per patient, per phone contact.	\$ 390. \$ 251 \$ 669 \$ 667 \$ 651 \$ 1,174 \$ 45  Direct Costs \$ 1,000 \$ 1,500 \$ 450 \$ 1,500 \$ 1,500 \$ 1,500 \$ 1,500 \$ 1,500 \$ 1,500 \$ 1,500	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12  Indirect Costs \$ 280 \$ 130 \$ 130 \$ 390 \$ 4117 \$ 78 \$ 441 \$ 39	\$ 491 \$ 316 \$ 843 \$ 940 \$ 820 \$ 1,376 \$ 1,479 \$ 57  Total \$ 1,280 \$ 630 \$ 567 \$ 378 \$ 200 \$ 1899	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MPI Pelvis CD Media Storage Fee (per disk)  Mise Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Survival Follow-up, per patient, per phone contact. Ancillary Services CTRC Outpatient Room/Procedure Room (each	\$ 390. \$ 251 \$ 668 \$ 668 \$ 667 \$ 651 \$ 1,174 \$ 45  Direct Costs \$ 1,000 \$ 500 \$ 450 \$ 450 \$ 1,500 \$ 450 \$ 150 \$ 150	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12  Indirect Costs \$ 260 \$ 130 \$ 390 \$ 117 \$ 78 \$ 41 \$ 39	\$ 491 \$ 316 \$ 843 \$ 820 \$ 1,376 \$ 1,479 \$ 57 Total \$ 1,260 \$ 1,830 \$ 567 \$ 200 \$ 378 \$ 200 \$ 189	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRIB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Survival Follow-up, per patient, per phone contact. Ancillary Services CTRC Outpatient Room/Procedure Room (each Ancillary Services CTRC Equipment Storage (Small: Sponsor EKG)	\$ 390 \$ 251 \$ 668 \$ 667 \$ 551 \$ 1,192 \$ 1,174 \$ 45 Direct Costs \$ 1,000 \$ 500 \$ 1,500 \$ 450 \$ 150 \$ 150 \$ 150 \$ 150	\$ 101  \$ 65  \$ 174  \$ 173  \$ 169  \$ 284  \$ 305  \$ 12  Indirect Costs  \$ 260  \$ 130  \$ 390  \$ 177  \$ 78  \$ 41  \$ 39  \$ 39  \$ 39  \$ 39	\$ 491 \$ 316 \$ 843 \$ 840 \$ 920 \$ 1,376 \$ 1,479 \$ 57 Total \$ 1,260 \$ 630 \$ 1,890 \$ 567 \$ 200 \$ 378 \$ 200 \$ 189 \$ 630	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MRI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Survival Follow-up, per patient, per phone contact. Ancillary Services CTRC Outpatient Room/Procedure Room (each Ancillary Services CTRC Outpatient Room/Procedure Room (each Ancillary Services CTRC Outpatient Room/Procedure Room (each Ancillary Services CTRC Ctpt Staff (each add't hour) Ancillary Services CTRC CTRC Equipment Storage (Small: Sponsor EKG) Patient Nutrition	\$ 390. \$ 251 \$ 669 \$ 667 \$ 667 \$ 1092 \$ 11,74 \$ 45  Direct Costs \$ 1,000 \$ 1,500 \$ 450 \$ 150 \$ 150 \$ 500 \$ 550 \$ 550 \$ 550	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12  Indirect Costs \$ 260 \$ 130 \$ 390 \$ 117 \$ 78 \$ 41 \$ 39 \$ 39 \$ 130 \$ 130	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57  Total \$ 1,260 \$ 630 \$ 378 \$ 200 \$ 189 \$ 189 \$ 189 \$ 630	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Survival Follow-up, per patient, per phone contact. Ancillary Services CTRC Outpatient Room/Procedure Room (each Ancillary Services CTRC Staff (each add't hour) Ancillary Services CTRC Equipment Storage (Small: Sponsor EKG) Patient Nutrition	\$ 390. \$ 251 \$ 668 \$ 668 \$ 667 \$ 651 \$ 1,174 \$ 45  Direct Costs \$ 1,000 \$ 500 \$ 1,500 \$ 450 \$ 150 \$ 150 \$ 500 \$ 500 \$ 500 \$ 500 \$ 500 \$ 500 \$ 500	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12  Indirect Costs \$ 260 \$ 130 \$ 390 \$ 117 \$ 78 \$ 41 \$ 39 \$ 310 \$ 310 \$ 310 \$ 310 \$ 35 \$ 310 \$ 35 \$ 35 \$ 35 \$ 35 \$ 36 \$ 36 \$ 37 \$ 38 \$ 38 \$ 38 \$ 38 \$ 38 \$ 38 \$ 38 \$ 38	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,473 \$ 57  Total \$ 1,260 \$ 630 \$ 1,880 \$ 567 \$ 378 \$ 200 \$ 189 \$ 189 \$ 630 \$ 630 \$ 53	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Ray CT Abdomen CT Chest CT Pelvis MPI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Misc Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRIB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Survival Follow-up, per patient, per phone contact. Ancillary Services CTRC Outpatient Room/Procedure Room (each Ancillary Services CTRC Equipment Storage (Small: Sponsor EKG) Patiking Transportation (Uber/Lift/Taxi,etc)	\$ 390 \$ 251 \$ 668 \$ 667 \$ 551 \$ 1,192 \$ 1,174 \$ 45 Direct Costs \$ 1,500 \$ 1,500 \$ 450 \$ 150 \$ 150 \$ 150 \$ 150 \$ 150 \$ 150 \$ 150	\$ 101  \$ 65  \$ 174  \$ 173  \$ 169  \$ 284  \$ 305  \$ 12  Indirect Costs  \$ 260  \$ 130  \$ 390  \$ 177  \$ 78  \$ 41  \$ 39  \$ 3	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57  Total \$ 1,260 \$ 630 \$ 378 \$ 200 \$ 189 \$ 189 \$ 630 \$ 633 \$ 25 Costs	Upon submission of invoice
Professional Radiology Reading Fee Chest X-Riay CT Abdomen CT Chest CT Pelvis MPI Abdomen MRI Abdomen MRI Pelvis CD Media Storage Fee (per disk)  Mise Audit Preparation Fee Serious Adverse Event (study team time and effort: Initial/Follow-Up/Resolution) Per Event Study Re-Open Process: Application preparation and submission to IRB, IMV Staff Time and Effort (Regulatory Coordinator & Study Coordinator) for Study Re-Open Process Storage Record Retrieval Fee for Study Re-Open Process Survival Follow-up, per patient, per phone contact. Ancillary Services CTRC Outpatient Room/Procedure Room (each Ancillary Services CTRC Staff (each add't hour) Ancillary Services CTRC Equipment Storage (Small: Sponsor EKG) Patient Nutrition	\$ 390 \$ 251 \$ 668 \$ 667 \$ 551 \$ 1,192 \$ 1,174 \$ 45 Direct Costs \$ 1,500 \$ 1,500 \$ 450 \$ 150 \$ 150 \$ 150 \$ 150 \$ 150 \$ 150 \$ 150	\$ 101 \$ 65 \$ 174 \$ 173 \$ 169 \$ 284 \$ 305 \$ 12  Indirect Costs \$ 260 \$ 130 \$ 390 \$ 117 \$ 78 \$ 41 \$ 39 \$ 39 \$ 505 \$ 130	\$ 491 \$ 316 \$ 843 \$ 840 \$ 820 \$ 1,376 \$ 1,479 \$ 57  Total \$ 1,260 \$ 630 \$ 378 \$ 200 \$ 189 \$ 630 \$ 189 \$ 630 \$ 250 Costs	Upon submission of invoice

### Financial Management -Charge Review

**CLINICAL TRIALS** 

#### Financial Management & Administrative Responsibilities

#### Monthly review of expenditures Principal Investigator Approve expenses Allocation of effort Provide updates on upcoming occurrences (study on hold, closure, etc.) Enrollment Log(s) Log participant in OnCore as well as Sponsor EDC systems; Study Team Reconcile patient care billing to patient enrollment in collaboration with Fund Manager (ST) Maintain Study Binder Data collection Process salary and expense transactions · Monthly review of salary & expenditures Make adjustments/corrections based on salary reports Department Fund Mgr Update projections (FM) Track patient data and Invoice sponsor Monthly reconciliation of patient care charges with Study Team & Ancillary Depts Provide administrative/financial support to PI Financial Training / Support Budget Development / Negotiation & Budget Payment Terms and Conditions Clinical Trial Program Account Reconciliation & Closeout support (CTP) Administrative Start-up Support

#### Patient Related Charges

- The REFUEL- March 2023 are charges in Care Connect that patients are linked to research account for Charge Review. These charges are reviewed by DOM central Charge Reviewing Unit. The data entered by study team in OnCore systems will assist Charge Reviewers in identifying charge adjudication. A few things to consider...
  - Are all patients charges to the study truly part of the study?
  - Are there any patients that you do not see on your list that you know participated?
  - Are some of these charges not related to the study?
  - Are some of the charges listed incorrectly?
- NOTE: Charges should be hitting account at the actual cost/non profit rate. Budget contracted is only the amount we should be invoicing for.

## Close-Out

#### Close-Out Responsibilities

#### Principal Investigator (PI)

- · Final reconciliation of all expenses
- · Attestation that all expenses are allocable and appropriate for the trial
- Resolution of any deficit

### Study Team (ST)

- Ensure all patient data has been submitted to sponsor
- Work with Fund Mgr to ensure sponsor has been billed for everything related to the clinical trial
- Work with Fund Mgr to ensure communication with respect to patient status and patient data.

### Department Fund Mgr (FM)

- · Reconcile expenses
- Transfer / correction of any inappropriate expenses
- Ensure all anticipated costs have hit account
- Prepare residual balance transfer form
- Resolution of any deficit

### Closing a Clinical Trial Account

The processes should include:

- Completion of a final account reconciliation prior to closure.
- DOM CT Checklist
  - Includes checks for receipt of proper documentation to authorize account closure.
    - ✓ Written correspondence from sponsor indicating closure for site.
    - ✓ Written confirmation from sponsor of final payment.
    - ✓ Notice of IRB Completion/Termination (can not close until final payment made)
- Verification that the account close-out(s) have occurred by EFM (Y/N'd).

NOTE: Keep in mind for balances greater than 25% of the total cost, the PI is required to provide additional justification for the large unexpended balance.

### Policy 913: Disposition of Unexpended Balances in Fixed Rate and Fixed Price Contracts and Nonrefundable Grants

- When is Policy 913 applicable?
  - This policy applies if there is an unexpended balance remaining after close-out of an expired or terminated fixed price or fixed rate contract or nonrefundable grant. Funds will be transferred into the PI's account/cc linked to Fund 69970.
- Who processes Policy 913 Transfers to fund 69970?
  - Campus departments are responsible for confirming Policy 913 fund transfers by EFM as the last step of the close out process. Upon receipt of the request and Closeout Packet, EFM will transfer the unexpended balance amount to the department's designated account/cost center and fund 69970.
- EFM Contact by Department/Division

#### Review of Key Points

- PI is responsible for all aspects of a clinical trial throughout the lifecycle, with assistance from Study Team and Department Fund Mgr
- Internal budget development is necessary to determine if sponsor budget will support the trial and how services will be expensed.
- CTP will assist with budget negotiation, payment terms and budget development as needed
- PI, Study Team and Fund Mgr are responsible for the post-award monitoring of expenses posted to the clinical trial activity number (Financial Management)
- PI works with Fund Mgr for attesting that all charges are appropriate prior to account closeout

#### Do You Have a Clinical Trial Inquiry?

Submit your inquiries to DOM Clinical Trial Program (<a href="DOMCTP@mednet.ucla.edu">DOMCTP@mednet.ucla.edu</a>)

#### Services offered:

- Regulatory and Fund Manager Services
- Training including group and 1-on-1 sessions
- Clinical trial start-up, maintenance and closure
- OnCore guidance and navigation
- CSE SOW department signature
- Any general Clinical Trial related questions and inquiries

## Links from Today's Class

- Clinical Trials Supporting Offices & Contacts
  - DOM CTP (DOMCTP@mednet.ucla.edu)
  - CTSI CSE (StudyActivation@mednet.ucla.edu)
  - CTC&SR (clinicaltrials@mednet.ucla.edu)
  - OCGA (proposals@research.ucla.edu)
  - TDG (Dept Assignments)
  - EFM (Dept Assignments)
- DOM Clinical Trials Fund Manager Manual Chapters
  - CT Acronyms & Key Terminology
  - CT Application Checklist
  - <u>CT Budget Template</u>

# Survey Link <a href="https://forms.gle/QaMyquTmKtNDEj1k8">https://forms.gle/QaMyquTmKtNDEj1k8</a>

We appreciate if you would take a few moments to complete a short 7 question anonymous survey to help us improve your training experience. Thank you!