Applying Concepts
Presented at the HCCA Research Academy

A Case Study of the Implementation Process

Discussion Objectives

• Review how we are assessing and adapting infrastructure and activities as recommended at the HCCA Research Academy for applicability in our entity's environment.

• Describe prioritized efforts, how we chose them, how they chose us, and how we collaborate with Medical Center partners.

• Describe obstacles we have encountered and the solutions we have or will deploy to overcome challenges to our efforts.
How We Became a Research Entity . . .

• 1882 - Maurice Porter Memorial Hospital in a four bed cottage in 1882.

• 1904 - became Children’s Memorial Hospital, a Chicago institution.

• Over decades – evolved into the Children’s Hospital of Chicago Medical Center, which includes the Ann & Robert H. Lurie Children’s Hospital of Chicago and the Stanley Manne Children’s Research Institute.

• Now partners with Northwestern University Feinberg School of Medicine as primary pediatric teaching hospital.

• The Stanley Manne Children’s Research Institute focuses on improving child health, transforming pediatric medicine, and ensuring healthier futures.

How did your entity become a research entity?

How is That History Pertinent?

• Organizational Culture

• “Organic” process development

• Community Support

• Professional Commitment

• Research focus/Priority

• Comfort/Resistance to Change

How is your entity’s history pertinent to your effort?
Deciding to Apply Research Academy Concepts

Compliance Program evaluation raises questions:

• Should Research Compliance be included in the general Compliance Program?

• Should Research Compliance be separate from the general Compliance Program?

• Or can we leverage the value and avoid potential detriment of each by designing hybrid, or bridged, or collaborative Compliance Program activities?

• Centralized or Decentralized?

What thoughts or experiences can you offer have about the benefits and detriments of each?

Research Academy Topics ⇝ Road Map for Assessment

• Research Billing
• Auditing and Monitoring
• Privacy and Security Issues in Research
• Conflicts of Interest
• Research Records Management

• Research Compliance as specialized compliance area
  • Scientific Misconduct
  • Human Subjects Protection
  • FDA-Regulated Research
  • Research Risk Assessment
  • Data and Safety Monitoring Issues
  • Animal Research
Essential Underpinnings for Success

Willing partners in Corporate Compliance and Research Compliance

• Proactive approach
• Identify and empower specialty expertise
• Set the tone
• Invest resources in the effort
• Plan and prepare for change as need is identified
• Educate, train, and lead

Can you offer examples of identifying or cultivating any of the above?

Continued Assessment and Planning

• Respond to the urgent needs
  • Research billing support . . . . . .
  • Privacy . . . . .
  • Consistent response to auditor access requests
• Develop methodical process for planning year to year activity
• Continuous improvement effort in well-established activities, e.g., Conflict of Interest disclosure and management activity
  • Compare General Compliance and Research Compliance processes
  • Combine or enhance processes, as possible
We Are Building Bridges!

Corporate Compliance \( \Rightarrow \) Research Compliance

Corporate Compliance activity identifies issue with research activity implications \( \Rightarrow \) escort it across the bridge to the proper Research Compliance resource.

Example: erroneous billing for research service invites review of coverage analysis, billing grid by Research – But repayment direction by Corporate Compliance.

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We Are Building Bridges!

Research Compliance \( \Rightarrow \) Corporate Compliance

Research Compliance activity identifies issue with non-research activity implications \( \Rightarrow \) escort it across the bridge to the proper Corporate Compliance resource.

Example: Research Compliance staff identify a potential conflict of interest through research disclosure – But the activity of concern is corporate, non research focused.
**We Are Building Bridges!**

Research Compliance activity identifies issue with non-research activity implications $\Rightarrow$ escort it across the bridge to the proper Corporate Compliance resource.

Example: Research Compliance staff identify a potential issue with obtaining consent when the research data flow implicates GDPR.

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**Second Stage Efforts – What It Looks Like**

- Partnership is solidifying in corporate and research compliance program activities:
  - Responding collaboratively to some workforce requests
  - Focusing on respective infrastructure that will support future work
  - Finding sustainable opportunities for success.
  - Recognizing and attaining incremental program development.
Navigating the Change

- Describe obstacles we might encounter and solutions we can deploy to overcome challenges to our efforts.
  - “This is how we’ve always done it.”
  - Disconnect between hospital-focused care and research-focused activity
  - Resources, resources, resources
  - Communication, data, and results as obstacle removers.

Questions? Please, feel free to ask now!
Or later – contact info below:

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