SECTION: Research and Compliance				NUMBER: CLN-22.00
CHAPTER: Clinical Research Standard Operating Procedures	ISSUED: 7/28/2008	REV. A: 5/4/2009	REV. B: 8/27/2010	REV. C:
TITLE: FDA Drug/Device Regulatory File Management			Page 1 of 4	

1. PURPOSE

To establish the documents that must be present as part of the Investigator regulatory files.

2. SCOPE

Applies to all site personnel involved in the implementation and coordination of Food and Drug Administration (FDA) drug/device sponsored clinical research investigations.

Personnel responsible: Principal Investigator (PI) and, when delegated by the PI, additional Investigators, Study Coordinators (SCs), and other designated site personnel.

3. RESPONSIBILITIES

The PI is responsible for all aspects of the conduct of clinical research, including the contents of the Regulatory Document Binder. The PI may delegate the mechanics of the operation to the Regulatory Document Specialist (RDS), but must be fully aware of its contents and the accuracy of the contents.

4. BACKGROUND

Regulatory documents consist of all records, reports, and pertinent correspondence related to the conduct of the research trial. The regulatory documents comprise the official study files and provide an audit trail detailing all information and the course of events for the entire study. All documents pertinent to the conduct of the study need to be on file with both the PI and the study sponsor. International Council on Harmonisation (ICH) guidelines specify essential documents that individually and collectively permit evaluation of the conduct of the research trial and the quality of the data produced. These documents serve to demonstrate the compliance of the PI, study sponsor, and study sponsor representative(s) with the standards of Good Clinical Practices (GCPs) and with all applicable regulatory requirements. These documents are usually audited by the study sponsor's independent audit function and inspected by the regulatory authority(ies) as part of the process to confirm the validity of the research trial's conduct and the integrity of the data collected.

5. PROCEDURE

5.1. The PI will be responsible for management of the regulatory files concerning the research investigation. He/she may delegate the duty of specific regulatory file management to appropriate clinical research personnel.

5.2. The SC or RDS will receive from the sponsor or sponsor's representative a regulatory binder with documents to be completed and reviewed prior to study initiation. The documents provided in the regulatory binder may include, but not be limited to:
- 5.2.1. Confidentiality Agreement
- 5.2.2. Investigator's Brochure
- 5.2.3. Protocol
- 5.2.4. Case Report Forms
- 5.2.5. Consent Form
- 5.2.6. Enrollment Worksheet
- 5.2.7. Form FDA 1572/Investigator Agreement Template
- 5.2.8. Financial Disclosure Template
- 5.2.9. Subject/Physician Information Letters (when applicable)
- 5.2.10. Study Reference Manual (when applicable)
- 5.2.11. Recruitment Materials (when applicable)
- 5.2.12. Screening/Enrollment Logs (when applicable)
- 5.2.13. Study Personnel Signature List (when applicable)
- 5.2.14. Monitoring Log (when applicable)

5.3. The SC or RDS will provide the sponsor or sponsor representative(s) with the following documents:
- 5.3.1. Signed Confidentiality Agreement
- 5.3.2. Curricula Vitae (for PI, Investigators, SCs, and other designated site personnel as indicated by sponsor)
- 5.3.3. Laboratory Accreditation Certificates
- 5.3.4. Laboratory Normal Reference Ranges
- 5.3.5. Signed Protocol (if required)
- 5.3.6. Signed Investigator's Brochure (if required)
- 5.3.7. Institutional Review Board (IRB) Membership List/Assurance Number (if required)
- 5.3.8. IRB Approval Letter for the Protocol
- 5.3.9. IRB-Approved Informed Consent Form
- 5.3.10. IRB-Approved Advertisements/Patient Education Materials
- 5.3.11. Enrollment Worksheet
- 5.3.12. Signed Form FDA 1572/PI's Agreement
- 5.3.13. Signed Financial Disclosure (for PI and additional staff as indicated)

5.4. The SC or RDS will send completed documents to the sponsor. Copies of all documents submitted to the sponsor should be retained and filed in the appropriate sections of the Investigator Regulatory Binder.

5.5. The SC or RDS will be responsible for maintaining the Investigator regulatory files as documents continue to accumulate throughout the course of the trial. Documents filed during the course of the investigation include:

5.5.1. Investigator's Curricula Vitae (Updates for PI and additional staff as indicated)
5.5.2. Laboratory Accreditation Certificates
5.5.3. Laboratory Normal Reference Ranges
5.5.4. Signed Protocol Amendments (if applicable)
5.5.5. Signed Investigator's Brochure (if required)
5.5.6. IRB Approval Letter for the Protocol Amendment(s)
5.5.7. IRB-Approved Informed Consent Form (if revised or renewed)
5.5.8. IRB-Approved Advertisements/Patient Education Materials
5.5.9. IND/IDE Safety Letters from the Sponsor
5.5.10. Subject/Physician Information Letters (when applicable)
5.5.11. Signed Form FDA 1572/Investigator Agreement (if new information)
5.5.12. Signed Financial Disclosure (if new information)
5.5.13. Sponsor/Site/IRB Correspondence
5.5.14. IRB Annual Renewal Application(s)/Approval(s)
5.5.15. Investigational Product Accountability Records

5.6. The SC and RDS will review the Investigator Regulatory Binder on a regular basis to ensure that outstanding items are addressed and all required documents are current.

5.7. The RDS will update and forward updated documents to the sponsor. Copies of all documents submitted to the sponsor should be filed in the appropriate sections of the Investigator Regulatory Binder at the site.

5.8. The PI will be responsible for retaining essential documents, upon completion of the trial, for a period of at least two years following the date the marketing application is approved for the investigational product for the indication investigated, or, if no application is to be filed or if the application is not approved for such indication, until two years after the investigation is discontinued and the FDA is notified.

5.9. In the event that documents need be retained for a longer period than noted in 5.8, the PI or designated site representative will obtain the sponsor's record retention

requirements in writing, including information as to when the documents no longer need to be retained. Research-related records will not be destroyed without written sponsor permission.

5.9.1. If the study sponsor is unreachable or unable to determine whether records can be destroyed, documents may be destroyed in accordance with the terms of the clinical study agreement.

5.10. If study-related records will be stored at an off-site location, the PI or designated site representative will provide the sponsor with the name, physical address, and phone number of the storage facility where the records will be stored.

6. TERMS & ABBREVIATIONS

CFR Code of Federal Regulations
FDA Food and Drug Administration
GCP Good Clinical Practice
ICH International Council on Harmonisation
IDE Investigational Device Exemption
IND Investigational New Drug
IRB Institutional Review Board

7. REFERENCES

7.1. Title 21 CFR 50.27 - Documentation of Informed Consent
7.2. Title 21 CFR 56.115 - IRB Records
7.3. Title 21 CFR 312.62 - Investigator Record Keeping and Record Retention for Clinical Drug Trials
7.4. Title 21 CFR 812.140 - Investigator Record Keeping and Record Retention for Clinical Device Trials
7.5. ICH GCP Consolidated Guideline - Part 4.9 Records and Reports
7.6. ICH GCP Consolidated Guideline - Part 8. Essential Documents for the Conduct of a Clinical Trial.

8. ATTACHMENTS

None