Regulatory Binder Guidance

What is the purpose of a regulatory binder?

- Achieve and maintain regulatory compliance
- Ensure protection of human subjects and high standards of research
- Guidance for organization and record keeping
- Guidance for proper study documentation and successful study management

Applicable Sections

Required

- Protocol
- CVs
- Staff Licensures
- Logs
- IRB Documents
- Data Collection/CRFs

Study Specific

- Lab Documents
- NIH
- Sponsor
- Drug/Device Accountability
- FDA
- DSMB

Protocol

- Currently approved version of the protocol
- All previously approved versions of the protocol
- If applicable, fully executed protocol signature page(s).

GCP 8.2.2, 8.3.2

CVs

- Signed and dated CVs for all study staff

  *If CVs are stored centrally, add a signed and date note-to-file indicating location

  *CVs should updated, signed, and dated every 2 years to ensure information is current

  *If CVs are stored electronically, document date prepared

GCP: 4.1.1, 8.2.10, 8.3.5

Staff Licensures

- Valid medical licenses/professional certifications for all IRB approved study staff
- CITI and GCP certifications

*Medical and nursing licenses must be renewed. It is important to monitor licensure expiration dates.

*If certifications are stored centrally, add a signed and date note-to-file indicating location

GCP 4.1.1, 8.2.10

Logs

- Eligibility checklist (identifiers for ineligible subjects should be blacked out/redacted unless permission is obtained from the subject)
- Enrollment/Subject Log
- Staff Signature/Delegation of Duties Log
- Monitoring Log
- Reportable Events Log (Deviations, SAEs, NC, etc.)
- Specimen Log

GCP 8.3.20, 8.3.25

IRB Documents

- All submission forms and documents (initial, continuing, amendments, reportable events, conflict of interest disclosure, non-compliance, close-out)
- IRB determination letters
- IRB correspondence
- IRB approved documents (advertisements, consent and assent forms, HIPAA authorization forms, protocol, data collection sheets, surveys, etc.)

GCP 8.2.7, 8.2.9, 8.3.2, 8.3.3 8.3.4

Data Collection / CRFs

- Blank set of CRFs, data collection sheets, and IRB-approved study questionnaires

  *Data collection sheets can serve as source documentation if information is recorded directly on forms.

21 CFR 312; GCP 8.3.14, 8.3.15, 4.9.3

Lab Documents

- Current Lab Certification (i.e., CLIA, CAP, State
- Lab Director CV and Medical License
- Normal Lab/Reference Values

*Lab licenses and certifications must be updated when they expire.

*If documents are stored separately, add a signed and date note-to-file indicating location

NIH

- Copy of the NIH Grant Application and Progress Reports
- Any additional study correspondences (e.g. e-mails) with NIH and collaborators

* Downloadable instructions and form files for PHS 398 (competing grants): http://grants.nih.gov/grants/funding/phs398/phs398.html

GCP 8.3.14, 8.3.15, 4.9.3

Sponsor

- Copy of all significant correspondence with the study sponsor(s) (i.e., letters, e-mails, meeting notes, and notes of telephone calls)
- Copy of the grant

* If documents are filed electronically, add a signed and date note-to-file indicating location

GCP 8.3.11

Drug/Device

- Drug/Device shipment and receipt records
- Drug/Device Accountability Log
- Most recent version of Investigator's Brochure or Device Manual
- Investigators Brochure/Package Insert

*If drugs are not dispensed by the pharmacy for a study, procedures must be in place to receive, dispense, and return drugs

*If the drug/device shipment, receipt, and accountability are managed by research pharmacy, indicate this in a note-to-file

FDA

Clinical Investigator (individual who conducts the study)

1. FDA 1572 (drug)
2. Investigator Agreement (device)
3. Serious Adverse Event reports submitted to Sponsor
4. Signed and dated copy of all Form FDA 3455 (Disclosure: Financial Interests and arrangements of Clinical Investigators)

FDA

Sponsor-Investigator (individual who initiates and conducts the study)

1. Clinician Investigator requirements 1 or 2 (previous slide)
2. Original application and all subsequent submissions to the FDA:
   - » IND Application (drug)
   - » IDE Application (device)
   - » Amendments to the Application
   - » Adverse Event Reports
   - » Annual Reports
3. Form 3674 (Certification of Registration to ClinicalTrials.gov)

FDA

- The 1572 should be updated and filed if changes are made during the course of the investigation.
- An IND Application must be filed when a sponsor wishes to test a newly developed drug or the use of a drug that is not yet approved by the FDA for marketing (21 CFR 312).
- The Form FDA 1571 is the cover sheet for the Investigational New Drug Application and should be included in all subsequent submissions to the FDA. Instructions for completing this form and the 1572 is available at: http://www.fda.gov/cder/forms/1571-1572-help.html
- An IDE Application must be filed for any device that poses significant risk (21 CFR 812).

Data Safety Monitoring

- Copy of all Data and Safety Monitoring Board/Committee (DSMB/DSMC) reports
- Additional correspondences with DSMB/DSMC (e.g. meeting minutes, information provided to the DSMB/DSMC, emails)

*If the most recent DSMB/DSMC report identifies safety issues, submit a copy to the IRB immediately; otherwise, submit the report at the time of continuing review.

GCP: 8.3.10; 5.19.3

General Guidance

- Create the binder at the beginning of the study, prior to enrollment
- Keep the binder updated
- Identify who is responsible for maintaining the binder
- Store binder in a secure location that is accessible to study staff at all times
- If binder sections are stored in a separate location, add a note to file behind the appropriate tab

General Guidance

- Maintain subject-specific documentation (i.e., signed consent forms, lab results, CRFs, etc.) separately within the subject-specific file
- Organize the binder to meet the needs of your study
- Perform routine audits to ensure binder is complete and up to date

Questions

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