Nova Southeastern University
Standard Operating Procedure for GCP

Title: Essential Documents for a Clinical Trial		Version # 1
SOP Number: OCR-ED-001	**Effective Date: August 2013**	**Page 1 of 12**

PURPOSE: The documentation required for clinical trials is dictated by Regulatory Agencies (e.g. USA FDA, Canadian TPD) and by the ICH cGCP Guidelines. Each Sponsor will have their own way of collecting the required documentation but the Essential Documents listed in this SOP for GCP will be required to be completed and submitted to the Sponsor. Documents may need to be revised for various reasons during the course of the trial. All documents of copies must be maintained in the Regulatory Binder at the site and the Sponsor will maintain a duplicate copy of each site's documents in their master files. It will be the responsibility of the Sponsor to submit those documents required by Regulatory Agencies to that agency.

POLICIES:

1. Confidentiality Agreement: **SEE SOP FOR GCP TITLE: Research Material Confidentiality / SOP Number: OCR-CON-001**

2. Clinical Trial Contract: **SEE SOP FOR CENTER /COLLEGE**

3. Regulatory Documents:
   - 3.1. FDA 1572: **IF APPLICABLE**
     - 3.1.1. Original document is required by the USA FDA.
     - 3.1.2. This document is to be signed by the Principal Investigator and is a Statement that he agrees to conduct the clinical trial in accordance with the current protocol and FDA regulations.
     - 3.1.3 The 1572 must be revised if there are changes during the course of the trial.
   - 3.2. Financial Disclosure: **IF APPLICABLE**
     - 3.2.1. Each Sponsor has developed their own Financial Disclosure Form to comply with the FDA regulations for disclosure of financial

interests in the company or products which may influence his/her conduct during the study.

3.2.2. A Financial Disclosure must be signed by all personnel that may influence the out come of the study at the research site

3.2.3. The original will be submitted to the Sponsor and a copy is to be maintained in the Regulatory Binder.

3.3. C.V.s and licences: **IF APPLICABLE**

3.3.1. It is requirement of the Sponsor to request a copy of the Principal Investigator's current medical licence and also his/her Curriculum Vitae.

3.3.1.1 All C.V. and licences must be current, signed and dated

3.3.2. This request may also be made of any Sub Investigator

3.3.3. The Sponsor will also request current Curriculum Vitae of research site employees who will be directly involved in the clinical trial.

3.3.4. This information may also be requested of any ancillary agencies such as Labs or Pharmacies.

3.3.4.1 The Sponsor will also require current accreditation certifications for laboratories.

3.4 Delegation of Authority Statements: **IF APPLICABLE**

3.4.1. Many Sponsors will request a Delegation of Authority Statement. Under FDA regulations and ICH cGCP the Principal Investigator is solely responsible for the conduction of the clinical trial at the investigational site. A delegation of Authority Statement allows the Principal Investigator to delegate some of the tasks/duties to other members of the team.

3.5 Site Signature Log: **IF APPLICABLE**

3.5.1 Each member of the research team involved with the clinical trial must sign the Site Signature Log, including initial date of involvement and date ending involvement. This will allow future examinations of the data to be reconciled with the employees who wrote that entry.

3.5.2 The Site Signature Log may also act as a delegation of Authority Form.

3.6 Master Subject List: **IF APPLICABLE**

3.6.1 A list of all subjects that received the test article must be maintained with the last know contact information for the subject.

3.6.1.1. This list must be cross referenced with the study number and initials used on the data collection forms.

3.6.1.2 The list must be maintained at the site for a period of 25 years and is not to be given to the Sponsor.

3.7 Other: **IF APPLICABLE**

3.7.1. There are other essential documents that must be maintained during the clinical trial. Refer to the TPD listing of Essential Documents below.

References:

THERAPEUTIC PRODUCTS DIRECTORATE GUIDELINES
ICH HARMONIZED TRIPARTITE GUIDELINE ESSENTIAL DOCUMENTS FOR THE CONDUCT OF A CLINICAL TRIAL

Introduction
Essential Documents are those documents which individually and collectively permit evaluation of the conduct of a trial and the quality of the data produced. These documents serve to demonstrate the compliance of the investigator, Sponsor and monitor with the standards of Good Clinical Practice and with all applicable regulatory requirements.
Essential Documents also serve a number of other important purposes. Filing essential documents at the investigator/institution and Sponsor sites in a timely manner can greatly assist in the successful management of a trial by the investigator, Sponsor and monitor. These documents are also the ones which are usually audited by the Sponsor's independent audit function and inspected by the regulatory authority(ies) as part of the process to confirm the validity of the trial conduct and the integrity of data collected.
The minimum list of essential documents which has been developed, follows the various documents that are grouped in three sections according to the stage of the trial during which they will normally be generated: 1) before the clinical phase of the trial commences, 2) during the clinical conduct of the trial, and 3) after completion or termination of the trial. A description is given of the purpose of each document, and whether it should be filed in either the investigator/institution or Sponsor files, or both. It is acceptable to combine some of the documents, provided the individual elements are readily identifiable.
Trial master files should be established at the beginning of the trial, both at the investigator/institution's site and at the Sponsor's office. A final close-out of a trial can only be done when the monitor has reviewed both investigator/institution and Sponsor files and confirmed that all necessary documents are in the appropriate files.
Any or all of the documents addressed in this guideline may be subject to, and should be available for, audit by the Sponsor's auditor and inspection by the regulatory authority(ies).

Before the Clinical Phase of the Trial Commences
During this planning stage the following documents should be generated and should be on file before the trial formally starts. Title of Document Purpose Located in File of Investigator/ Center/ College/ Sponsor

Title of Document	**Purpose**	**Located in Files**	
		of Investigator/ Institution	Sponsor
8.2.1 INVESTIGATOR'S BROCHURE	To document that relevant and current scientific information about the investigational product has been provided to the investigator	X	X
8.2.2 SIGNED PROTOCOL AND AMENDMENTS , IF ANY, AND SAMPLE CASE REPORT FORM (CRF)	To document investigator and Sponsor agreement to the protocol/amendment(s) and CRF	X	X
8.2.3 INFORMATION GIVEN TO TRIAL SUBJECT -INFORMED CONSENT FORM (including all applicable translations) -ANY OTHER WRITTEN INFORMATION -ADVERTISEMENT FOR SUBJECT RECRUITMENT (if used)	To document the informed consent To document that subjects will be given appropriate written information (content and wording) to support their ability to give fully informed consent To document that recruitment measures are appropriate and not coercive	X X X	X X
8.2.4 FINANCIAL ASPECTS OF THE TRIAL	To document the financial agreement between the investigator/institution and the Sponsor for the trial	X	X
8.2.5 INSURANCE STATEMENT (where required)	To document that compensation to subject(s) for trial-related injury will be available	X	X
8.2.6 SIGNED AGREEMENT BETWEEN INVOLVED PARTIES, e.g.: - investigator/institution and Sponsor - investigator/institution and CRO - Sponsor and CRO - investigator/institution and authority(ies) (where required)	To document agreements	X X X	X X (where required) X X
8.2.7 DATED, DOCUMENTED APPROVAL/FAVOURABLE OPINION OF INSTITUTIONAL REVIEW BOARD (IRB)	To document that the trial has been subject to review and given approval/favourable opinion. To	X	X

IRB/IEC /INDEPENDENT ETHICS COMMITTEE (IEC) OF THE FOLLOWING: - protocol and any amendments - CRF (if applicable) - informed consent form(s) - any other written information to be provided to the subject(s) - advertisement for subject recruitment(if used) - subject compensation (if any) - any other documents given approval/favourable opinion	identify the version number and date of the document(s).		
8.2.8 INSTITUTIONAL REVIEW BOARD/INDEPENDENT ETHICS COMMITTEE COMPOSITION	To document that the IRB/IEC is constituted in agreement with GCP	X	X (where required)
8.2.9 REGULATORY AUTHORITY(IES) AUTHORISATION/APPROVAL/ NOTIFICATION OF PROTOCOL (where required)	To document appropriate authorisation/approval/notification by the regulatory authority(ies) has been obtained prior to initiation of the trial in compliance with the applicable regulatory requirement(s)	X (where required)	X (where required)
8.2.10 CURRICULUM VITAE AND/OR OTHER RELEVANT DOCUMENTS EVIDENCING QUALIFICATIONS OF INVESTIGATOR(S) AND SUB-INVESTIGATOR(S)	To document qualifications and eligibility to conduct trial and/or provide medical supervision of subjects	X	X
8.2.11 NORMAL VALUE(S)/RANGE(S) FOR MEDICAL/LABORATORY/TECHNICAL PROCEDURE(S) AND/OR TEST(S) INCLUDED IN THE PROTOCOL	To document normal values and/or ranges of the tests	X	X
8.2.12 MEDICAL/LABORATORY/TECHNICAL PROCEDURES /TESTS - certification or	To document competence of facility to perform required test(s), and support reliability of results	X (where required)	X

- accreditation or - established quality control and/or external quality assessment or - other validation (where required)			
8.2.13 SAMPLE OF LABEL(S) ATTACHED TO INVESTIGATIONAL PRODUCT CONTAINER(S)	To document compliance with applicable labelling regulations and appropriateness of instructions provided to the subjects		X
8.2.14 INSTRUCTIONS FOR HANDLING OF INVESTIGATIONAL PRODUCT(S) AND TRIAL-RELATED MATERIALS (if not included in protocol or Investigator's related materials Brochure)	To document instructions needed to ensure proper storage, packaging, dispensing and disposition of investigational products and trial	X	X
8.2.15 SHIPPING RECORDS FOR INVESTIGATIONAL PRODUCT(S) AND TRIAL-RELATED MATERIALS	To document shipment dates, batch numbers and method of shipment of investigational product(s) and trial-related materials. Allows tracking of product batch, review of shipping conditions, and accountability	X	X
8.2.16 CERTIFICATE(S) OF ANALYSIS OF INVESTIGATIONAL PRODUCT(S) SHIPPED	To document identity, purity, and strength of investigational product(s) to be used in the trial		X
8.2.17 DECODING PROCEDURES FOR BLINDED TRIALS	To document how, in case of an emergency, identity of blinded investigational product can be revealed without breaking the blind for the remaining subjects' treatment	X	X (third party if applicable)
8.2.18 MASTER RANDOMISATION LIST AU HASARD	To document method for randomisation of trial population		X (third party if applicable)
8.2.19 PRE-TRIAL MONITORING REPORT	To document that the site is suitable for the trial (may be combined with 8.2.20)		X
8.2.20 TRIAL INITIATION MONITORING REPORT	To document that trial procedures were reviewed with the investigator and the investigator's trial staff (	X	X

	may be combined with 8.2.19)		

8.3 During the Clinical Conduct of the Trial

In addition to having on file the above documents, the following should be added to the files during the trial as evidence that all new relevant information is documented as it becomes available

Title of Document	Purpose	Located in Files	
		of Investigator/ Institution	Sponsor
8.3.1 INVESTIGATOR'S BROCHURE UPDATES	To document that investigator is informed in a timely manner of relevant information as it becomes available	X	X
8.3.2 ANY REVISION TO: - protocol/amendment(s) and CRF documents that take effect during trial - informed consent form - any other written information provided to subjects - advertisement for subject recruitment(if used)	To document revisions of these trial related	X	X
8.3.3 DATED, DOCUMENTED APPROVAL/FAVOURABLE OPINION OF INSTITUTIONAL REVIEW BOARD (IRB)/ INDEPENDENT ETHICS COMMITTEE (IEC) OF THE FOLLOWING: - protocol amendment(s) - revision(s) of:	To document that the amendment(s) and/or revision(s) have been subject to IRB/IEC review and were given approval/favourable opinion. To identify the version number and date of the document(s).	X	X

- informed consent form - any other written information to be provided to the subject - advertisement for subject recruitment (if used) - any other documents given approval/favourable opinion - continuing review of trial (where required)			
8.3.4 REGULATORY AUTHORITY(IES) AUTHORISATIONS/APPROVALS/ NOTIFICATIONS WHERE REQUIRED FOR: - protocol amendment(s) and other documents	To document compliance with applicable regulatory requirements	X (where required)	X
8.3.5 CURRICULUM VITAE FOR NEW INVESTIGATOR(S) AND/OR SUB-INVESTIGATOR(S)	(see 8.2.10)	X	X
8.3.6 UPDATES TO NORMAL VALUE(S)/RANGE(S) FOR MEDICAL/LABORATORY/TECHNICAL PROCEDURE(S)/TEST(S) INCLUDED IN THE PROTOCOL	To document normal values and ranges that are revised during the trial (see 8.2.11)	X	X
8.3.7 UPDATES OF MEDICAL/LABORATORY/TECHNICAL PROCEDURES/TESTS - certification or - accreditation or - established quality control and/or external quality assessment or - other validation (where required)	To document that tests remain adequate throughout the trial period (see 8.2.12)	X (where required)	X
8.3.8 DOCUMENTATION OF INVESTIGATIONAL PRODUCT(S) AND TRIAL-RELATED MATERIALS SHIPMENT	(see 8.2.15)	X	X
8.3.9 CERTIFICATE(S) OF ANALYSIS FOR NEW BATCHES OF INVESTIGATIONAL PRODUCTS	(see 8.2.16)		X

8.3.10 MONITORING VISIT REPORTS	To document site visits by, and findings of, the monitor		X
8.3.11 RELEVANT COMMUNICATIONS OTHER THAN SITE VISITS - letters - meeting notes - notes of telephone calls	To document any agreements or significant discussions regarding trial administration, protocol violations, trial conduct, adverse event (AE) reporting	X	X
8.3.12 SIGNED INFORMED CONSENT FORMS	To document that consent is obtained in accordance with GCP and protocol and dated prior to participation of each subject in trial. Also to document direct access permission (see 8.2.3)	X	
8.3.13 SOURCE DOCUMENTS	To document the existence of the subject and substantiate integrity of trial data collected. To include original documents related to the trial, to medical treatment, and history of subject	X	
8.3.14 SIGNED, DATED AND COMPLETED CASE REPORT FORMS (CRF)	To document that the investigator or authorised member of the investigator's staff confirms the observations recorded	X (copy)	X (original)
8.3.15 DOCUMENTATION OF CRF CORRECTIONS	To document all changes/additions or corrections made to CRF after initial data were recorded	X (copy)	X (original)
8.3.16 NOTIFICATION BY ORIGINATING INVESTIGATOR TO SPONSOR OF SERIOUS ADVERSE EVENTS AND RELATED REPORTS	Notification by originating investigator to Sponsor of serious adverse events and	X	X

	related reports in accordance with 4.11		
8.3.17 NOTIFICATION BY SPONSOR AND/OR INVESTIGATOR, WHERE APPLICABLE, TO REGULATORY AUTHORITY(IES) AND IRB(S)/IEC(S) OF UNEXPECTED SERIOUS ADVERSE DRUG REACTIONS AND OF OTHER SAFETY INFORMATION	Notification by Sponsor and/or investigator, where applicable, to regulatory authorities and IRB(s)/IEC(s) of unexpected serious adverse drug reactions in accordance with 5.17 and 4.11.1 and of other safety information in accordance with 5.16.2 and 4.11.2	X (where required)	X
8.3.18 NOTIFICATION BY SPONSOR TO INVESTIGATORS OF SAFETY INFORMATION	Notification by Sponsor to investigators of safety information in accordance with 5.16.2	X	X
8.3.19 INTERIM OR ANNUAL REPORTS TO IRB/IEC AND AUTHORITY(IES)	Interim or annual reports provided to IRB/IEC in accordance with 4.10 and to authority(ies) in accordance with 5.17.3	X	X (where required)
8.3.20 SUBJECT SCREENING LOG	To document identification of subjects who entered pre-trial screening	X	X (where required)
8.3.21 SUBJECT IDENTIFICATION CODE LIST	To document that investigator/institution keeps a confidential list of names of all subjects allocated to trial numbers on enrolling in the trial. Allows investigator/institution to reveal identity of any subject	X	
8.3.22 SUBJECT ENROLLMENT LOG	To document chronological enrollment of subjects by trial number	X	
8.3.23 INVESTIGATIONAL PRODUCTS ACCOUNTABILITY AT THE SITE	To document that investigational	X	X

	product(s) have been used according to the protocol		
8.3.24 SIGNATURE SHEET	To document signatures and initials of all persons authorised to make entries and/or corrections on CRFs	X	X
8.3.25 RECORD OF RETAINED BODY FLUIDS/TISSUE SAMPLES (IF ANY)	To document location and identification of retained samples if assays need to be repeated	X	X

8.4 After Completion or Termination of the Trial

After completion or termination of the trial, all of the documents identified in sections 8.2 and 8.3 should be in the file together with the following

Title of Document	**Purpose**	**Located in Files**	
		of Investigator/ Institution	Sponsor
8.4.1 INVESTIGATIONAL PRODUCT(S) ACCOUNTABILITY AT SITE	To document that the investigational product(s) have been used according to the protocol. To document the final accounting of investigational product(s) received at the site, dispensed to subjects, returned by the subjects, and returned to Sponsor	X	X
8.4.2 DOCUMENTATION OF INVESTIGATIONAL PRODUCT DESTRUCTION	To document destruction of unused investigational products by Sponsor or at site	X (if destroyed at site)	X
8.4.3 COMPLETED SUBJECT IDENTIFICATION CODE LIST	To permit identification of all subjects enrolled in the trial in case follow-up is required. List should be kept in a confidential manner and for agreed upon time	X	
8.4.4 AUDIT CERTIFICATE (if available)	To document that audit was performed		X

8.4.5 FINAL TRIAL CLOSE-OUT MONITORING REPORT	To document that all activities required for trial close-out are completed, and copies of essential documents are held in the appropriate files		X
8.4.6 TREATMENT ALLOCATION AND DECODING DOCUMENTATION	Returned to Sponsor to document any decoding that may have occurred		X
8.4.7 FINAL REPORT BY INVESTIGATOR TO IRB/IEC WHERE REQUIRED, AND WHERE APPLICABLE, TO THE REGULATORY AUTHORITY(IES).	To document completion of the trial	X	
8.4.8 CLINICAL STUDY REPORT	To document results and interpretation of trial	X (if applicable)	

References:

21 CFR 312.60	General responsibilities of investigators
21 CFR 312.62	Investigator recordkeeping and record retention
21 CFR 312.68	Inspection of investigator's records and reports
FDA Information Sheets, October, 1995	Recordkeeping in Clinical Investigations
May 9, 1997	International Conference on Harmonisation; Good Clinical Practice: Consolidated Guideline