Procedure Name: Regulatory Binder and Study File Maintenance	**Number:** SOP 3 v3.0
Subject: Clinical Research	**Effective Date:** July 01, 2004
Linked Policy: Clinical Research Operations & Compliance Policy	**Revised Date:** February 07, 2023

PURPOSE:

To establish the GW Medical Faculty Associates (MFA) procedure for filing, maintaining and updating regulatory and other study-related documents and the period under which documents must be maintained.

SCOPE:

This SOP applies to all research team members responsible for filing, maintaining and updating regulatory and other study-related documents. This SOP applies to both IND as well as non-IND, as applicable.

RESPONSIBILITY:

This procedure sets forth responsibilities for research team members involved with filing, maintaining, and updating regulatory and other study-related documents. The Principal Investigator (PI) retains this responsibility unless the investigator has expressly delegated this duty to a research team member and the delegation is documented on a study specific Delegation of Authority Log.

PROCEDURES:

Regulatory Binder

1. Prepare or obtain a regulatory binder as soon as possible after first contact with the sponsor or, for investigator-initiated studies, as soon as a protocol outline/investigational plan has been drafted.
2. Label the regulatory binder with the following:
    - Protocol/IRB/IND/IDE number (if applicable)
    - Principal Investigator Last name;
    - Sponsor name; (if applicable) and
    - Any other information required by the sponsor (if applicable).

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3. All regulatory binders should include the information outlined in sections 8.2, 8.3, and 8.4 of the ICH/GCP guidelines. See Attached Chart. The amount of documentation will vary between industry-initiated studies and investigator-initiated studies.
4. Ensure that all regulatory documents include a version number and version date.
5. If documents are filed separately from the regulatory binder, draft a note to file (NTF) to be inserted in the regulatory binder indicating where the documents can be located Update the Regulatory Binder by filing any subsequent study-related documents as they are received/approved by the IRB. Original versions are in the back; most recent versions organized in front.
6. In addition to the ICH/GCP documents listed under Section 8.2, 8.3, and 8.4, you may choose to maintain the following:
    a. Applicable federal regulations/guidelines;
    b. A study specific Delegation of Responsibilities Form; and
    c. Relevant training records.
    d. Correspondences between PI and Research Staff or sponsor

Note: The miscellaneous category may vary with each study/sponsor

<u>Retention of Records</u>

1. All records must be stored at MFA, or if on-site storage is impractical, in a secure off-site facility where they may be readily accessed in the event of an audit. Alternatively, with IRB approval, study records may be sent to Sponsor headquarters for storage on-site or at a secure off-site facility**. A NTF must be sent to and approved by the sponsor if storing study records in an off-site facility.**
2. All records pertaining to a clinical trial must be retained until the following have been met (whichever is the greater length must be followed):
    - If all participants are adults: at least three years after completion of the research
    - If participants are children: until all participants are 18 years of age, or for three years after the completion of the research, whichever is longer
    - If the study involves Protected Health Information, research records must be maintained for a minimum of six years after the completion of the research.
    - For drug studies conducted under an IND, two years following the date a marketing application is approved for the drug for the indication for which it is being investigated;

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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 FDA is notified.
- For device studies conducted under an IDE or abbreviated IDE, two years after the latter of the following two dates: The date on which the investigation is terminated or completed, or the date that the records are no longer required for purposes of supporting a premarket approval application or a notice of completion of a product development protocol.
- The retention period required by the sponsor or the Clinical Trial Agreement ("CTA")
- The retention period required by local, state, or international law.

<u>Long Term Storage</u>

1. Once a study has been closed out through the IRB and/or CRO (if applicable) all research materials from the clinical trial may be placed into a box.
2. The box should be labeled on the outside with:
   a. The Protocol Title and ID
   b. The PI's Name
   c. Date of Closure
   d. GWU MFA Address
   e. Department
3. Notify our long-term storage provide, Iron Mountain, of the exact location where you need the boxes picked up from, including the office number. The addresses for the Iron Mountain are:

   8679 Greenwood PL. Savage, MD 20763
   8901 Snowden River Parkway, Columbia, MD 21046
4. If applicable, notify the sponsor that the study has been placed into a long-term storage facility.
5. If the clinical trial materials are needed for an audit, please reach out to Iron Mountain at least a week before the audit is due in order to ensure it is shipped back to the site in time.

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REFERENCES:

21 CFR 312.57	Recordkeeping and record retention.
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.
21 CFR 812.36	Treatment use of an investigational device.
21 CFR 812.40	General responsibilities of sponsors.
21 CFR 812.43	Selecting investigators and monitors.
21 CFR 812.45	Informing investigators.
21 CFR 812.100	General responsibilities of investigators.
21 CFR 812.110	Specific responsibilities of investigators.
21 CFR 812.140	Records.
21 CFR 812.145	Inspections.
21 CFR 812.150	Reports.
ICH E6 (R2)	Integrated Addendum to ICH E6 (R1): Guideline for Good Clinical Practice E6 (R2)
MFA SOP 18	Long-Term Storage

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GWU, OHR Investigator Guidance Documents and IRB policies/SOPs	Investigator Guidance Documents and IRB policies/SOPs HRP-800 Investigator Responsibilities HRP-807 Submission Requirements HRP-816 Investigator Guidance- Additional ICH-GCP obligations

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Section 8.2

Documentation Generated Before 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 Files of	
			Investigator	Sponsor
8.2.1	**INVESTIGATOR'S BROCHURE/DEVICE MANUAL**	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/INVESTIGATIONAL PLAN AND AMENDMENTS, IF ANY, AND SAMPLE CRFs**	To document investigator and sponsor agreement to the protocol/amendment(s) and case report form (CRF)	X	X
8.2.3	**INFORMATION GIVEN TO TRIAL SUBJECT**			
	INFORMED CONSENT FORM (including translations)	To document the informed consent	X	X
	ANY OTHER WRITTEN INFORMATION	To document that subjects will be given appropriate written information (content and wording) to support their ability to give fully informed consent	X	X

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
	ADVERTISEMENT FOR SUBJECT RECRUITMENT	To document that recruitment measures are appropriate and not coercive	X	
8.2.4	**FINANCIAL ASPECTS OF THE TRIAL**	To document financial agreement between investigator/institution and sponsor	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 AGREEMENTS BETWEEN INVOLVED PARTIES, e.g.:** • Investigator/institution and sponsor or CRO; • Investigator/institution and regulatory authorities.	To document agreements, e.g., Form FDA 1572 if study is under an IND.	X	X
8.2.7	**DATED, DOCUMENTED IRB SUBMISSION AND APPROVAL OF THE FOLLOWING:** • Protocol and any amendments; • CFR, if applicable; • Informed consent form (ICF); • Any other written information provided to subjects; • Advertisements for subject recruitment, if used; • Subject compensation, if any; and • Any other documents given IRB approval.	To document that the trial has been subject to IRB review and given approval. To identify the version number and date of the document(s).	X	X
8.2.8	**IRB COMPOSITION**	To document that the IRB is constituted in agreement with GCP	X	

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
				X (where required)
8.2.9	**REGULATORY AUTHORITY(IES) APPROVAL/ NOTIFICATION OF PROTOCOL** (where required)	To document appropriate approval/notification by regulatory authority(ies) has been obtained prior to initiation	X (where required)	X (where required)
8.2.10	**CVs/RESUMES EVIDENCING QUALIFICATIONS OF PI, SUB-INVESTIGATOR(S), IF ANY, AND ANY RESEARCH STAFF SIGNED AND DATED WITHIN THE LAST 2 YEARS**	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 results	X	X
8.2.12	**MEDICAL/ LABORATORY/ TECHNICAL PROCEDURES/ TESTS** • certification or accreditation; • established quality control and/or external quality assessment or • other validation	To document competence of facility to perform required test(s), and support reliability of results	X (where required)	X
8.2.13	**SAMPLE OF LABEL(S) ATTACHED TO INVESTIGATIONAL PRODUCT CONTAINER(S)**	To document compliance with applicable labeling regulations and		X

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
		appropriateness of instructions provided to the subjects		
8.2.14	**INSTRUCTIONS FOR HANDLING INVESTIGATIONAL PRODUCT(S) AND TRIAL-RELATED MATERIALS** (if not included in protocol or IB/Device Manual)	To document instructions needed to ensure proper storage, packaging, dispensing and disposition of investigational products and trial-related materials.	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 (third party if applicable)	X
8.2.18	**MASTER RANDOMIZATION LIST**	To document method for randomization of trial population	X	X (third party if applicable)

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
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 (may be combined with 8.2.19)	X	X
8.2.21	**MONITORING CONFIRMATION LETTER AND FOLLOW UP REPORT**	To document that trial procedures were reviewed with the investigator and the investigator's trial staff (may be combined with 8.2.19)		X
8.2.22	**MONITROING VIST LOG**	To document the name of monitors who conducted the visit and staff who acknowledged the visit		
8.2.23	**ALL TRAINING RECORDS** • **GOOD CLINICAL PRACTICE (GCP)** • **ALL SPONSOR REQUIRED TRAINING** • **PROTCOL SPECIFIC/PROTOCOL UPDATE TRAINING**	To document that training protocols and procedures were reviewed with the investigator and the investigator's trial staff	X	X
8.2.24	**MEDICAL LICESNE OF PI AND SUB-INVESTORAGORS, IF ANY**	To document qualifications and eligibility to conduct trial and/ or provide medical supervision of subjects	X	X

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Section 8.3

Documentation Generated During the conduct of the Clinical 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	Sponsor
8.3.1	**INVESTIGATOR'S BROCHURE UPDATES**	To document that investigator is informed of relevant information as it becomes available	X	X
8.3.2	**ANY REVISION TO:** • **protocol/amendment(s) and CRF** • **ICF/RSAF;** • **any other written information provided to subjects;** • **advertisements for subject recruitment, if used.**	To document revisions of these trial related documents that take effect during trial	X	X
8.3.3	**DATED, DOCUMENTED IRB APPROVAL OF THE FOLLOWING:** • **protocol amendment(s);** • **revisions of:** a. ICF; b. **any other written information provided to subjects;** c. **advertisements for subject recruitment, if used;** d. **any other documents given approval; and**	To document that the amendment(s) and/or revision(s) have been subject to IRB review and approval. To identify the version number and date of the document(s)	X	X

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
	e. **continuing review, where required**			
8.3.4	**REGULATORY AUTHORITY(IES) APPROVALS/ NOTIFICATIONS WHERE REQUIRED FOR:** • **protocol amendment(s) and other documents**	To document compliance with applicable regulatory requirements	X	X (where required)
8.3.5	**CVs/RESUMES FOR NEW PI,SUB-INVESTIGATOR(S), AND/OR RESEARCH STAFF SIGNED AND DATED WITHIN THE LAST 2 YEARS**	(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; • established quality control and/or external quality assessment or • other validation	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

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
8.3.9	**CERTIFICATE(S) OF ANALYSIS FOR NEW BATCHES OF INVESTIGATIONAL PRODUCTS**	(see 8.2.16)		X
8.3.10	**MONITORING CONFIRMATION LETTER AND FOLLOW UP 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 • study newsletters	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 subject participation. Also documents 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. To include original documents related to the trial, medical treatment and history of subject	X	
8.3.14	**SIGNED, DATED AND COMPLETED CASE REPORT FORMS (CRF)**	To document that the investigator or authorized member of the investigator's staff confirms the observations recorded	X (copy)	X (original)

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
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 SAEs AND RELATED REPORTS**	Notification by originating investigator to sponsor of serious adverse events and related reports in accordance with 4.11	X	X
8.3.17	**NOTIFICATION BY SPONSOR AND/ OR INVESTIGATOR, WHERE APPLICABLE, TO REGULATORY AUTHORITY(IES) AND IRB(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) 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 AND AUTHORITY(IES)**	Interim or annual reports provided to IRB 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. Note the reason why a subject was not ultimately enrolled.	X	X (where required)
8.3.21	**SUBJECT IDENTIFICATION CODE LIST**	To document that investigator keeps a confidential list of names of all subjects allocated to trial numbers on	X	

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
		enrolling in the trial. Allows investigator/ institution to reveal identity of any subject		
8.3.22	**SUBJECT ENROLLMENT LOG**	To document chronological enrollment of subjects by trial number. Note, subject enrollment log can be combined with subject screening log.	X	
8.3.23	**INVESTIGATIONAL PRODUCTS ACCOUNTABILITY AT THE SITE**	To document that investigational product(s) have been used according to the protocol	X	X
8.3.24	**SIGNATURE SHEET**	To document signatures and initials of all persons authorized 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

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Section 8.4

Documentation Generated After Trial Completion/Termination

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	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	

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	Title of Document	Purpose	Located in Files of	
			Investigator	Sponsor
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 AND WHERE APPLICABLE, TO 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)	X