**Purpose****:**This template may be used to record and track regulatory documents for human subjects research clinical trials with Investigational Product (IP) not approved under an FDA IND/IDE. These are studies that have been approved as IND Exempt or granted an NSR determination by the IRB or FDA.

**Responsibility:**To be used byPrincipal Investigators and study team members who are delegated to manage regulatory documents for human subjects research clinical trials with IP not approved under an FDA IND/IDE.

**Regulatory Documentation Checklist:**

**Investigational Product under Non-IND or -IDE Human Subjects Research Clinical Trials**

* Study teams are encouraged to use this checklist as a guide for creating a regulatory binder that compiles essential documents for the conduct of a study that meets the [NIH definition of a clinical trial](https://grants.nih.gov/policy/clinical-trials/definition.htm) with an investigational drug or device that is not approved under an FDA Investigational New Drug (IND) application or Investigational Device Exemption (IDE). These are studies that have been approved as IND Exempt or granted an NSR determination by the IRB or FDA.
* Principal Investigators (PIs) are responsible for following any institutional, state, or federal policies pertaining to regulatory documentation.
* A regulatory binder is a central organized file (can be paper or electronic or both) that houses documents pertaining to the conduct of the study (e.g., Institutional Review Board (IRB) approvals, CVs, licenses, study team meeting minutes, template case report forms, etc.).
* The following documents are recommended to be on file in the study regulatory binder.

**IRB-Related Documents:**

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| Document | Description |
| All Versions of IRB-Approved Protocols and Amendments | It is strongly recommended that PIs create a stand-alone protocol for each study that includes the specific aims and procedures. The initial IRB submission and all subsequent submissions to the IRB should be on file. |
| All Versions of IRB-Approved Informed Consent/Assent Forms | Best practice is to include version numbers/dates in the headers or footers. |
| All IRB Approval Letters | Approval letters should be on file. |
| IRB Continuing Review Submissions and Approvals | The continuing review submitted to the IRB should be on file, along with any approvals, modification requests, and other correspondence with the IRB. |

**DSMB-Related Documents:**

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| Document | Description |
| DSMB Correspondence, Reports, and Approvals | DSMB required documents should be submitted to the DSMB per the DSMB Charter. |
| DSMB Charter | Describes the member composition, role, obligations, meeting schedule/format, and study approval process for the DSMB. |

**NIMH-Related Documents:**

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| Document | Description |
| Documents Related to NIMH Grants Management | Grant application, Notice of Grant Award, financial documents, etc. |
| NIMH Progress Report Submissions and Correspondence | Submitted annually to NIMH Program Officer to outline study progress for a reporting period. |
| Reportable Events | Certain events related to a study require expedited reporting to NIMH. See:<https://www.nimh.nih.gov/funding/clinical-research/nimh-reportable-events-policy.shtml>. |
| Final Study Reports | Upon completion/termination of the study, the PI is responsible for submitting final reports to regulatory authorities as required. |

**Study Staff Training & Qualifications Documents:**

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| Document | Description |
| Current Signed and Dated CVs/Biosketches | Signed and dated CVs should be on file for each study team member listed on the delegation of authority log. CVs should include each staff member’s affiliation with the institution at which the study is being conducted. |
| Study Personnel Licenses | Current licenses should be on file for any licensed staff. |
| Financial Disclosure Forms and/or Conflict of Interest Forms | Documents the presence/absence of conflicts of interest for all study staff involved in the clinical trial who meet the definition of a COI Investigator per the UA policy. PIs should ensure conflicts are disclosed per [21CFR54.](https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=54) |
| Documentation of Human Subjects Protection Training | Required for all study staff involved in the design and conduct of clinical research involving human subjects. |
| Documentation of Occupational Safety and Health Administration (OSHA) and International Air Transport Association (IATA) training | Documentation of training is on file for individuals shipping specimens (if applicable). |
| Documentation of Study-Specific Training | Training logs should be on file for staff training on study-specific tasks, and should include at minimum: name of trainer, name of trainee, and training completion date. The study MOP should describe the process for each study training. |

**Ongoing Study Operations Documents:**

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| --- | --- |
| Document | Description |
| Manual of Operations (MoP) | If applicable, a stand-alone document that describes how to operationalize the protocol. This document contains practical information about the daily conduct of the study and how data are collected/stored. |
| Documentation of External and Internal Correspondence | Documentation of major internal and external communications regarding study decisions, important communications with Sponsor, etc. |

**Investigational Product (IP) Documents:**

|  |  |
| --- | --- |
| **Document** | **Description** |
| **IP Shipping Records** | Documents the quantity of IP received, the date received, and the receiver. |
| **IP Certificate of Analysis** | Where applicable, a certificate of analysis provides information on the identity, strength, stability, and purity of IP. |
| **Investigator Brochure** | Documents that the site has received the most relevant and current scientific information about the investigational product. |
| **IP Prescription Template** | This is a sample prescription template that will be used to prescribe IP during the study. Different states/institutions have different requirements for the type of information that must be on prescriptions. |
| **Sample IP Label** | This is a sample label that will be affixed to the IP for each dispensation to participants. Different states/ institutions have different requirements for the type of information that must be on these labels. |
| **Drug Destruction Policy** | A drug destruction policy should be created for each clinical trial. This policy describes the timepoint at which drug will be destroyed (commonly after drug accountability is performed by a site monitor or at the end of the study), who will be responsible for drug destruction, and if any witnesses are required. |

**Study Logs and Templates Documents:**

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| Document | Description |
| Delegation of Authority Log | This document is a living document to catalogue staff who have been delegated by the PI to work on the study at various stages throughout the study’s life. The log should be used to record all study staff members’ significant study-related duties, as delegated by the PI. |
| Subject Screening Log Template | Identifies participants who entered pre-trial screening. |
| Subject Enrollment Log Template | Reflects the chronological order of subjects who meet eligibility criteria/are enrolled. |
| Confidential Subject Identification Code Template | Links subject numbers to subject names/contact info and is stored in a double-locked location accessible to only study staff. |
| Protocol Violations and Deviations Log | Tracks subject-specific and study-wide protocol deviations/violations. |
| Adverse Event/Serious Adverse Event (AE/SAE) log | Tracks subject-specific and study-wide AEs and SAEs. |
| Sample Source Documents and Case Report Forms | Documents onto which subject data will be recorded. Can be paper or electronic. |

**Blinded Studies Documents:**

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| Document | Description |
| SOP for Emergency Unblinding | An emergency unblinding SOP should be readily available to staff delegated to access this information in the event a participant or his/her provider must be informed of the participant’s actual study intervention. |

**Randomized Studies Documents:**

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| Document | Description |
| Master Randomization Code | Documents the method for randomization of participants. |

**Studies Collecting Biological Samples Documents:**

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| Document | Description |
| Laboratory Certifications and Accreditations | College of American Pathologists (CAP) and Clinical Laboratory Improvement Amendments (CLIA) Accreditation, Joint Commission on Accreditation of Healthcare Organizations (JCAHO), CLIA Compliance, CLIA exempt, etc. |
| Current and Historical Normal Ranges | Includes all clinical laboratory tests required by the protocol, the unit of measure, the laboratory name, and the date of the document. |
| Sample Tracking Log | Documents location and identification of retained body fluids/tissues. |

**Studies Receiving On-Site Monitoring Documents:**

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| Document | Description |
| Site Monitoring/Audit Reports | If study is monitored routinely by a clinical site monitor or audited by a regulatory body (e.g., the IRB, OHRP, etc.), all correspondence and reports should be on file. |