INTRO TO REGULATORY DOCUMENTATION

MIDSOUTH SOCRA EDUCATIONAL MEETING

SEPTEMBER 2, 2021

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QUICK NOTES

- First half of presentation will cover what regulatory documents are and how to understand what you need for your study.
- Second half (Ray) will cover best practices for electronic documentation.
- Goal: give you the tools for you to find this information on your own

BACKGROUND: DEFINING REGULATIONS

- CFR: Code of Federal Regulations
  - Federal rules published by the departments and agencies of the Federal Government
  - Most often, we see Section 21 (FDA) and Section 45 (HHS)
    - FDA regulations apply when you have a investigational drug or device; HHS regulations apply to any federally funded research
  - Examples:
    - 21 CFR 11
    - 45 CFR 46
  - CFR is available in electronic format
- ICH GCP: International Council for Harmonization Good Clinical Practices
  - Adopted as guidance by US Department of Health and Human Services

BACKGROUND: INDUSTRY SPONSORED VS. INVESTIGATOR INITIATED

Industry sponsored trials

- Research paid for by an industry organization that has contracted with a researcher to carry out research.
- Industry sponsor usually designs the study and owns the protocol.
- Roles for sponsor and investigator.

Investigator-initiated trials

- Investigator conceives the research, develops the protocol, and carries out the research.
- Since the Sponsor-Investigator develops the protocol, things like organizing essential documents are often left to the study team.

ESSENTIAL DOCUMENTS

- ICH GCP E6 (R2) section 8.1 defines **essential documents** as documents that 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 GCP and with all applicable regulatory requirements.
- Grouped temporally:
  - Before trial commences
  - During the conduct of a trial
  - After completion or termination of a trial
- A collection of all these essential documents is often called a Regulatory Binder or Investigator Site File.

TWO TYPES OF RESEARCH DOCUMENTS

Containing participant data (CRF's)

- Often contain participant data such as survey questions, lab results, AE's, informed consent forms (ICF's), etc.
- 21 CFR 312.62

Regulatory documentation

- Enrollment logs, IRB documentation, investigator CV's

WHO?

- PI is ultimately responsible for all aspects of a trial, but management of regulatory documentation is often delegated to a Study Coordinator.
- Sponsor — trial master file, documents for all study sites

WHY?

01

Demonstrate compliance

- Validates compliance to regulations and protection of human subjects.

02

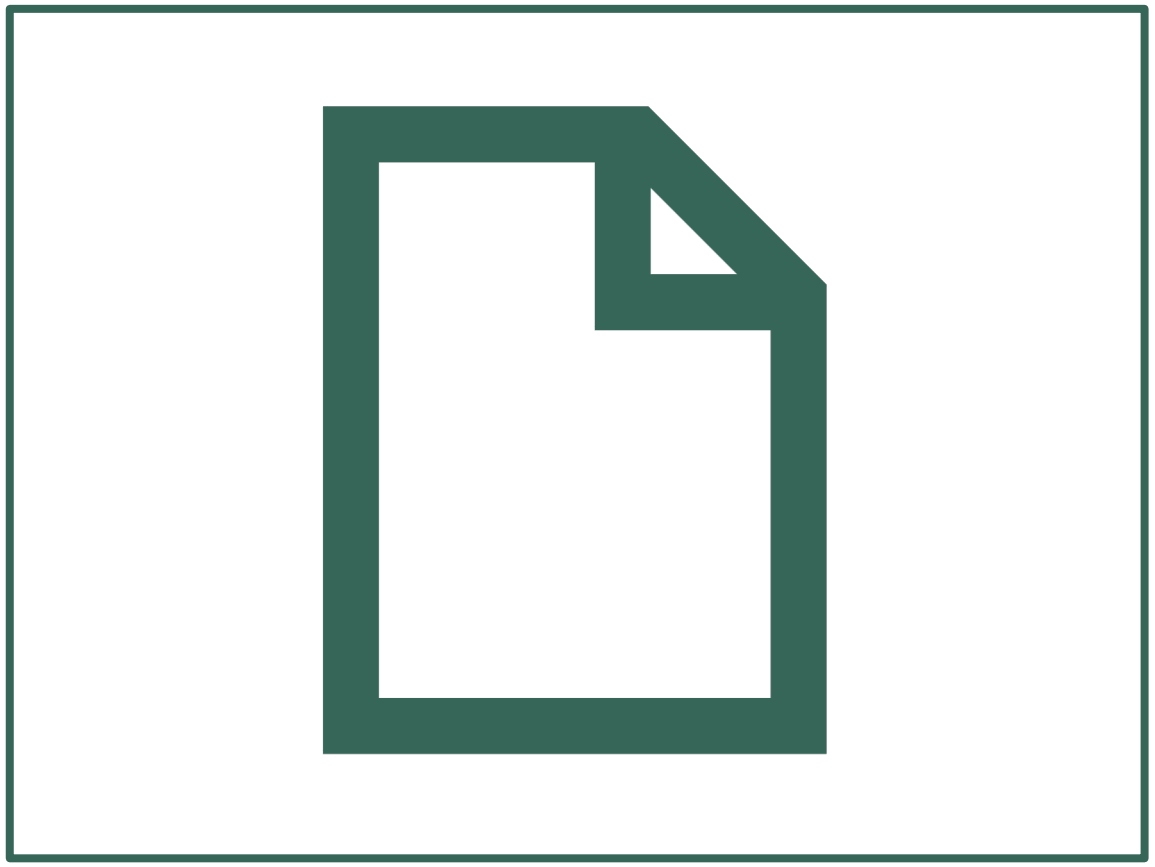
Can assist in the successful management of a trial.

- Allows easy access to study documents for reference.

03

Can help anyone needing this information at a later time

STARTING THE PROCESS



- Can keep electronically, on paper, or both — whichever way you decide, you can apply the same principles.
- Decide which documents you need and how to organize

HOW TO DECIDE WHICH DOCUMENTS YOU NEED

- Documents needed will differ based on type and phase of trial (ex: industry sponsored vs. investigator-initiated; device trial vs. behavioral intervention)
- Sponsors will often have procedures for setting up a binder.
- Some funding agencies have guidances as well.
  - NCCIH Clinical Research Toolbox

HOW TO DECIDE WHICH DOCUMENTS YOU NEED, CONTINUED

- ICH GCP E6 (R2) section 8.1 has detailed lists broken down by before, during, and after trial with the purpose of each document.
- If you're still confused, remember that this is a standard research practice so there will be loads of information available for you to look up!

MAINTENANCE

- Set up binder or electronic system with necessary sections (tabs or folders).
- Make sure you keep all versions of all the necessary documents!
  - Just because you have a new version of the Manual of Procedures, you still may need to access the old one.
  - Label new versions with date and/or version number.
  - Side note: dating in the YYYY-MM-DD format keeps files in order (as opposed to month first) and follows ISO 8601.
- Update as you go
  - Can update things as they're received.
  - Set reminders monthly, quarterly, etc. based on your needs.

REFERENCES

- https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf
- https://www.advarra.com/blog/beginners-guide-to-investigator-initiated-trials/
- https://www.iths.org/investigators/handbook/set-up-the-study/industry-sponsored-clinical-trials/
- https://www.fda.gov/media/93884/download
- https://www.nccih.nih.gov/grants/toolbox