A sponsor-investigator assumes BOTH investigator and sponsor responsibilities as outlined in the FDA Code of Federal Regulations 21 CFR 312. This means that such investigators have additional responsibilities. Use this checklist to verify sponsor and investigator responsibilities at the onset and during the course of your study.

*Note: It is the investigator’s responsibility to review and familiarize themselves with FDA regulations outlined in 21CFR312 (as additional responsibilities are listed), Good Clinical Practice (GCP) Guidelines ICH E6, and any other regulations and policies that may apply.*

**Principal Investigator**: **IND#:**

**IRB#**: **IRB Approval Date**:

**Protocol Title**:

**Date of ECO-HSR Visit:**

**Sponsors are responsible for:**

1. Selecting qualified investigators

 For each site investigator and sub-investigator obtain:

* Signed FDA form 1572 (Investigator Agreement)
* CV or other statement of qualifications such as a professional license
* Written disclosure of any financial conflicts of interest
* Clinical protocol to be used and approved by the investigator’s institution

2. Ensuring that the investigator and sub-investigators:

* Understand the nature and purpose of the clinical trial and the clinical trial procedures
* Are capable of conducting or supervising the conduct of the clinical trial
* Are aware that any Investigator-recommended changes to the clinical trial protocol must be first communicated to the Sponsor, who is ultimately responsible for making such changes
* Have submitted new risk information and protocol changes to the IRB and that IRB-approval of respective research protocol/consent form modifications has been obtained

3. Ensuring proper monitoring of investigations by:

* Selecting a monitor

 *All sites must have a monitoring log and maintain correspondence with the*

 *Monitor. See FDA Guideline for the Monitoring of Clinical Investigations*

* Assuring that the clinical trial is being conducted in accordance with the current version of the clinical trial protocol and applicable regulations and policies
* Having a documented and adequate monitoring plan to include the review and evaluation of the data and drug safety and effectiveness

 Safety data reviewers: [ ]  PI [ ]  DSMB [ ]  Medical Monitor [ ]  Other:

* Reviewing monitoring reports, protocol deviations, and other anticipated problems (e.g., medical and ethical issues that may arise during the course of the clinical trial); to include how the Sponsor will respond to identified investigator and/or study site non-compliance or other deficiencies

4. Promptly reporting to FDA and participating investigators the following:

* Current Investigator’s Brochure - *This must be provided to all participating investigators prior to starting the investigation*
* Changes to the clinical trial protocol
* Serious and unexpected adverse events (i.e., associated with the investigational drug) *Notification to FDA should be within 15 calendar days after receipt of information. For any* *unexpected fatal or life-threatening experience associated with the use of the drug, notification to FDA should be within 7 calendar days after receipt of information*
* New risk information related to the drug under investigation
* Notification (of FDA, all participating investigators, and institutional review boards) if the drug presents unreasonable and significant risk to subjects and discontinue investigation within 5 working days

5. Maintaining an effective IND with respect to the investigations

 Provide FDA with the following:

* Annual reports on the progress of the investigation - *within 60 days of the anniversary date that the IND went into effect*
* Protocol amendments:
* Changes in a protocol relating to: Phase 1 protocol that significantly affects the safety of subjects, or Phase 2 or 3 protocol that significantly affects the safety of subjects, the scope of the investigation or the scientific quality of the study
* A new investigator
* A new protocol
* Information amendments containing essential information on the IND that is not within the scope of a protocol amendment, IND safety reports, or annual report, such as new toxicology, chemistry, or other technical information; or a report regarding the discontinuance of a clinical investigation
* Preparing an adequate Final Study Report following completion of the clinical trial and the submission of this report to the FDA

6. Ensuring control of the investigational new drug

* Distributing the investigational drug to the Investigator’s study site; to include, if applicable, ensuring accountability of the investigational drug at the Sponsor’s manufacturing and/or central storage location
* Maintaining adequate records showing receipt, shipment, or other disposition of IND

  *Records must include name of investigator to whom drug is shipped, date, quantity,*

 *and batch or code mark of each shipment*

* Ensuring the return of all unused supplies/IND from each investigator and maintaining adequate records of all returns/disposal of IND
* Complying with the Controlled Substances Act
* Ensuring the immediate packaging of the IND intended for human use bears a label with the statement, ***Caution: New Drug-Limited by Federal (or United States) law to investigational use***, and the drug label does not bear any statement that is false or misleading and does not represent that the IND is safe or effective for the purposes for which it is under investigation
* Must not represent the IND in a promotional context that it is safe or effective for the purposes for which it is under investigation or otherwise promote the drug.
* Current Good Manufacturing Practices (cGMPs): Ensure the minimum current good manufacturing practice for preparation of drug products for administration to humans or animals in compliance with the requirements of §501(a)(2)(B) of the FD&C Act

Other Requirements:

* If any responsibilities will be transferred to a contract research organization (CRO), such transfers must be detailed in writing
* Maintaining all regulatory documentation including original IND application, FDA form 1571, FDA letter of no objection, IND safety reports, amendments, annual reports, and any other correspondence with the FDA, participating site investigators, and CRO (if applicable)
* Allowing the FDA, at reasonable times, to and copy and verify any records or reports relating to the clinical investigation

**PRINCIPAL INVESTIGATOR RESPONSIBILITIES**

Each participating investigator is responsible for:

1. Conducting the study according to the signed investigator statement, protocol, and applicable regulations including:

* Submitting the clinical trial protocol for initial IRB review and approval
* Submitting progress reports, safety reports, final report, and financial disclosure reports to the Sponsor and the IRB
* Assuring IRB review and approval including:
	+ Initial and continuing review
	+ Submitting the current Investigational Brochure
	+ Submitting any amendments/modifications for IRB review and approval
	+ Reporting to Sub-investigators and research staff of IRB-approved changes to the clinical trial protocol
	+ Collecting up-to-date financial disclosure information for all study site Sub-investigators who may be involved in the treatment and/or evaluation of research subjects, providing this information to the Sponsor
	+ Reporting serious adverse events, protocol violations/deviations, and unanticipated problems in accordance with institutional requirements to the Sponsor and the IRB
	+ Reviewing protocol deviations and other unanticipated problems; to include responding to identified Sub-Investigator or research staff non-compliance.
* Only making changes in a protocol after notifying the sponsor and obtaining IRB approval, except when necessary to eliminate immediate hazards to human subjects

2. Protecting the rights, safety, and welfare of subjects under the investigator’s care including:

* Personally conducting or supervising the described investigation
* Assessing the appropriate execution of tasks delegated to Sub-investigators and research staff
	+ Delegated task assessments should provide for assurance that the clinical trial is being conducted according to the clinical trial protocol and applicable regulations; that the rights, safety and welfare of the research subjects are being adequately protected; and that there is adequate and appropriate control of the investigational drug or device. In addition, the delegated task assessments should evaluate compliance with the procedures for the reporting of identified adverse events, protocol deviations, and other unanticipated problems (e.g., medical and ethical issues that may arise during the course of the clinical trial) to the Investigator.
	+ Reviewing of assessments focused on the appropriate execution of tasks delegated to Sub-investigators and research staff and responding to identified non-compliance or other deficiencies
* Providing adequate, documented training to all Sub-investigators and research staff who will participate in the conduct of the clinical trial; to include ensuring that the Sub-investigators and research staff:
	+ Are familiar with the purpose of the clinical trial and the location of the current version of the clinical trial protocol
	+ Have an adequate understanding of the specific details of the protocol and the attributes of the investigational product as needed to perform their delegated tasks
	+ Are aware of regulatory requirements and acceptable standards for the conduct of clinical trials and the protection of human subjects; to include that no changes from the clinical trial protocol are permitted without prior IRB approval
* Selecting Sub-investigators who will administer or dispense the investigational drug or device in the absence of the Investigator and ensuring that these individuals are responsible to the Investigator and are appropriately qualified by education, training, experience and state licensure to perform the task
* Developing and maintaining a clinical trial-specific list of appropriately qualified (by education, training and experience and state licensure where relevant) Sub-investigators and research staff to whom significant clinical trial tasks have been delegated
	+ This list should describe the delegated tasks, identify (e.g., curriculum vitae) the training that these individuals have received which qualifies them to perform their delegated tasks, and specify the dates of these individuals’ involvement in the clinical trial
	+ Sign-off signatures of the respective Sub-investigators and research staff should be obtained as documentation that these individuals have knowledge of and have accepted their delegated tasks
* Obtaining and documenting informed consent from all human subjects receiving investigational drug (unless exception requirements are met)
* Promptly reporting to the sponsor of any adverse effect that may be reasonably regarded as caused by or probably caused by the drug, and to the IRB of any serious and unexpected adverse events and unanticipated problems involving risks to human subjects or others

 *See FDA Guideline for Investigator Responsibilities - Protecting the Rights, Safety,*

 *and Welfare of Study Subjects*

* Reporting, to the Sponsor, sub-investigators and research staff, additional new risk information related to the drug under investigation

3. Controlling drugs under investigation including:

* Administering drug only to subjects under the investigator’s or sub-investigator’s personal supervision
* Maintaining adequate records of the use and disposition of drug, including dates, quantity and use by all subjects

 Returning unused drug to sponsor or disposing of drug as instructed by sponsor

* Compliance with the Controlled Substances Act - *Local laws and policies must also be followed regarding the use of controlled substances in research*

4. Preparing and maintaining accurate case histories or records for each subject including:

* Case Report Forms (CRFs) and supporting data (source documents)
* Signed and dated consent forms
* Medical records (e.g. physicians’/nurses’ progress notes, individual hospital chart)

Other Requirements:

* Maintaining all regulatory documentation including FDA form 1572, required reports and correspondence with the sponsor, monitor, FDA, or IRB
* Allowing the FDA, at reasonable times, to and copy and verify any records or reports relating to the clinical investigation