Roles and Responsibilities of the Research Team Module
Part 1: Principal Investigator

Slides from: Elizabeth Ness, RN, MS
Nurse Consultant (Education)
Center for Cancer, NCI
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OHRP's Use of "Investigator"…

- Any individual who is involved in conducting human subjects research studies
- Such involvement would include:
  - obtaining information about living individuals by intervening or interacting with them for research purposes;
  - obtaining identifiable private information about living individuals for research purposes;
  - obtaining the voluntary informed consent of individuals to be subjects in research; and
  - studying, interpreting, or analyzing identifiable private information or data for research purposes.

Investigator Responsibilities…

- Design and implement ethical research, consistent with three ethical principles delineated in the Belmont report
- Comply with all applicable federal regulations impacting the protection of human subjects
- Ensure that all research involving human subjects is submitted to and approved by the appropriate institutional review board

…Investigator Responsibilities…

- Comply with all applicable IRB policies, procedures, decisions, conditions, and requirements
- Implement research as approved and obtain prior IRB approval for changes
- Obtain informed consent and assent in accord with federal regulations and as approved by the IRB
- Document informed consent and assent in accord with federal regulations and as approved by the IRB

…Investigator Responsibilities

- Report progress of approved research to the IRB, as often and in the manner prescribed by the IRB
- Report to the IRB any injuries, adverse events, or other unanticipated problems involving risks to subjects or others
- Retain signed consent documents and IRB research records for at least 3 years past completion of the research activity

FDA and the Role of the Investigator

- All Investigators should refer to 21 CFR Parts 11, 50, 54, 56, 312, and 812 for a more comprehensive listing of FDA's requirements
- Clinical Investigator (CI) is the investigator who has the overall responsibility for the conduct of the clinical trial
- Other Investigators are referred to as Sub-investigators
- FDA Form 1572 used for drugs and biologics
- Signed agreement used for devices

Investigator Commitments…

- Conduct study in accordance with the relevant, current protocol and will only make changes in a protocol after notifying the sponsor, except when necessary to protect the safety, right, or welfare of subjects
- Personally conduct or supervise the described investigation

…Investigator Commitments…

- Inform any patients, or any persons used as controls, that the drugs are being used for investigational purposed and ensure requirement relating to obtaining informed consent in 21 CFR Part 50 and IRB review and approval in 21 CFT Part 56 are met
- Agree to report to sponsor adverse experiences that occur in the course of the investigation in accordance with 21 CFR 312.64

…Investigator Commitments…

- Read and understand the information in the investigator's brochure, including the potential risks and side effects of the drug
- Agree to ensure all associates, colleagues, and employees assisting in the conduct of the study are informed about their obligations in meeting the previous commitments

…Investigator Commitments…

- Maintain adequate and accurate records in accordance with 21 CFR 312.62 and to make those records available for inspection in accordance with 21 CFR 312.68
- Ensure that an IRB that complies with the requirements of 21 CFR Part 56 will be responsible for the initial and continuing review and approval of the clinical investigation

…Investigator Commitments

- Comply with all other requirements regarding the obligation of clinical investigators and all other pertinent requirements in 21 CFR Part 312

Form 1572

- Form 1572 is updated as needed
- There is one Form 1572 per study, per site
- All copies of the Form 1572 are to be maintained in the regulatory binder
- *Guidance for Sponsors, Clinical Investigators, and IRBs: Frequently Asked Questions—Statement of Investigator (Form FDA 1572)*

FDA Guidance

- Supervision of the conduct of an clinical investigation
  - Were individuals who were delegated tasks qualified/licensed to perform the tasks
  - Did study staff received adequate training on how to conduct the delegated tasks and were provided with an adequate understanding of the study
  - Was there was adequate supervision and involvement of the PI in the ongoing conduct of the study
  - Was there adequate supervision or oversight individual not in the PI's employ
- Protecting the Rights, Safety, and Welfare of Study Subjects

Delegation Log

- Ensure that the individuals performing study-related tasks and procedures are appropriately trained and authorized by the PI
- PI Tasks delegated based on:
  - Training
  - Licensure
- Completed prior to the initiation of any study-related tasks and procedures and as staff leave or are added
- Separate log for each study

E6: Investigator Qualifications & Agreements

- The Investigator should:
  - Be qualified by education, training & experience to assume responsibility for proper trial conduct
  - Be familiar with the appropriate use of the investigational product, IB, and other information provided by sponsor
  - Be aware of, and comply with, GCP and the applicable regulatory requirements
  - Permit monitoring, auditing and inspection
  - Delegate duties to appropriately qualified persons

E6: Adequate Resources

- The Investigator should:
  - Demonstrate adequate potential for recruitment
  - Have sufficient time for trial conduct and completion
  - Have adequate staff and facilities to conduct the trial
  - Ensure training to staff

E6: Communication with IRB

- The Investigator should:
  - Seek written & dated approval for trial protocol, informed consent document, recruitment procedures, etc. prior to trial initiation
  - Provide latest copies of Investigator Brochure (IB) to IRB
  - Provide all relevant documents for review during trial

E6: Compliance with Protocol

- The Investigator should:
  - Conduct trial in accordance with the protocol version agreed & documented by the sponsor, IRB and regulatory authority
  - Ensure that no changes are allowed in the protocol except in case of immediate hazard to the patient

E6: Investigational Product

- The Investigator:
  - Is responsible for investigational product accountability at the site
  - May be assigned to pharmacist/individual
  - Ensure that investigational product is stored as specified by sponsor or regulatory authority
  - Ensure that the investigational product is used only in accordance with the protocol

E6: Randomization Procedures and Unblinding

- The Investigator:
  - Should follow the trial's randomization procedure
  - Report any premature unblinding to be explained to sponsor

E6: Informed Consent..

- The Investigator should:
  - Comply with regulatory requirement, GCP and ethical principles
  - Document communication of revised consent document to IRB and patient
  - Not influence or coerce subject to participate
  - Ensure that the subject or their legal representative is fully informed in their own language
  - Review subject's responsibilities as part of the informed consent process

…E6: Informed Consent

- The Investigator should:
  - Ensure that the informed consent document does not contain technical language
  - Allow ample time for the consent process and opportunity for exchange of information or subject questions
  - Provide an impartial witness for illiterate patients
  - Provide the subject with a copy of the signed and dated Informed Consent Document

E6: Records and Reports

- The Investigator:
  - Should ensure accuracy, completeness, legibility and timeliness of data to sponsor in CRF
  - Ensure corrections on a CRF be signed and dated
  - Should maintain trial related documents
  - Ensure all financial agreements are in place prior to subject enrollment
  - Provide access to records by monitor, regulatory agency or auditors
  - Submit progress reports to IRB

E6: Safety Reporting

- The Investigator should:
  - Report all serious adverse events, including deaths, to sponsor and IRB/regulatory agency as per SOPs

E6: Premature Termination of Trial

- The Investigator should:
  - Inform subjects
  - Assure therapy and follow up
  - Inform sponsor, IRB, and other regulatory authorities as per SOPs

E6: Final Report

- Upon completion of the study, the Investigator should provide the IRB and other regulatory authorities with a summary of the trial's outcome

Summary

- PI ultimately accountable for study conduct
- Needs to understand:
  - HHS/OHRP regulations
  - FDA regulations
  - ICH GCP guidelines
- Must ensure that all members of the team understand their responsibilities