Investigators should be fully aware of their obligations and responsibilities required by the IRBMED and applicable regulatory agencies prior to conducting research. To assist investigators with identifying full ICH-GCP responsibilities, IRBMED developed this ICH-GCP checklist, which provides a partial summary—sections 4 and 8—of investigator responsibilities pertinent to data and document management in accordance with the ICH E6(R2)(R2) Good Clinical Practice (GCP) Guideline, issued November 2016. This checklist is for informational purposes only. It is not a requirement that the study teams complete this checklist or upload it into the eResearch IRB application. However, it is still the principal investigator’s responsibility to meet the elements of ICH-GCP E6(R2) as outlined in the checklist.

Certain ICH E6(R2) elements are covered in IRBMED approved materials such as the eResearch application; those elements are identified in the black-text in the right side box; other items that are not currently covered are identified with red-text in the right side box.

|  |  |
| --- | --- |
| **Investigator Qualifications and Agreements (E6(R2) 4.1)** |  |
| As the investigator, I attest to the following:* I am qualified by education, training, and experience to assume responsibility for the proper conduct of the trial; I meet all the qualifications specified by the applicable regulatory requirement(s), and will provide evidence of such qualifications through up-to-date curriculum vitae and/or other relevant documentation requested by the sponsor, the IRB/IEC, and/or the regulatory authority(ies). *(4.1.1)*
* I am thoroughly familiar with the appropriate use of the investigational product(s), as described in the protocol, in the current Investigator's Brochure, in the product information, and in other information sources provided by the sponsor. *(4.1.2)*
* I am aware and will comply with the Good Clinical Practice guideline and the applicable regulatory requirements: https://database.ich.org/sites/default/files/E6(R2)\_R2\_Addendum.pdf *(4.1.3)*
* I am aware that I must permit monitoring and auditing by the sponsor, and inspection by the appropriate regulatory authorities. *(4.1.4)*
* I am aware that I must maintain a list of appropriately qualified persons to whom I have delegated significant trial-related duties.*(4.1.5)*
 | These E6(R2) statements are specific to ICH GCP; review carefully. |
| **Adequate Resources (E6(R2) 4.2)** |  |
| As the investigator, I attest to the following:* I am able to demonstrate (e.g., based on retrospective data) a potential for recruiting the required number of suitable subjects within the agreed recruitment period. *(4.2.1)*
* I have sufficient time to properly conduct and complete the trial within the agreed trial period. (*4.2.2)*
* I have available an adequate number of qualified staff and adequate facilities for the foreseen duration of the trial to conduct the trial properly and safely. *(4.2.3)*
* I can ensure that all persons assisting with the trial are adequately informed about the protocol, the investigational product(s), and their trial-related duties and functions. *(4.2.4)*
* I am responsible for supervising any individual or party to whom the investigator delegates trial-related duties and functions conducted at the trial site. *(4.2.5)*
* If I retain the services of any individual or party to perform trial-related duties and functions, I should ensure this individual or party is qualified to perform those trial-related duties and functions and should implement procedures to ensure the integrity of the trial-related duties and functions performed and any data generated. *(4.2.6)*
 | These E6(R2) statements are specific to ICH GCP; review carefully. |
| **Medical Care of Trial Subjects (E6(R2) 4.3)** |  |
| As the investigator, I attest to the following:* A qualified physician (or dentist, when appropriate), either myself or a sub-investigator for the trial, will be responsible for all trial-related medical (or dental) decisions. *(4.3.1)*
* During and following a subject's participation in a trial, I will ensure that adequate medical care is provided to a subject for any adverse events (including clinically significant laboratory values) related to the trial, both during and following a subject's participation in a trial. I will inform a subject when medical care is needed for intercurrent illness(es) of which I become aware. *(4.3.2)*
* I will inform the subject's primary physician about the subject's participation in the trial if the subject has a primary physician and if the subject agrees to the primary physician being informed. *(4.3.3)*
* Although a subject is not obliged to give his/her reason(s) for withdrawing prematurely from a trial, I will make a reasonable effort to ascertain the reason(s), while fully respecting the subject's rights. *(4.3.4)*
 | These ICH E6(R2) elements are covered in the following study-related materials: Item 4.3.1: Investigator Assurance Statement in the approved eResearch IRB applicationItems 4.3.2 & 4.3.3: Approved eResearch IRB applicationItem 4.3.4: Informed consent document |
| **Communication with the IRB (E6(R2) 4.4)** |  |
| As the investigator, I will:* have written and dated approval from the IRB for the research application, written informed consent form, consent form updates, subject recruitment procedures (e.g., advertisements), and any other written information to be provided to subjects. *(4.4.1)*
* provide the IRB with a current copy of the Investigator's Brochure. If the Investigator's Brochure is updated during the trial, I will provide a copy of the updated Investigator's Brochure to the IRB. *(4.4.2)*
* provide the IRB with all documents subject to review according to the IRB’s requirements.*(4.4.3)*
 | These ICH E6(R2) elements are covered in the following study-related materials: Items 4.4.1 – 4.4.3: Approved eResearch IRB application |
| **Compliance with the IRB-Approved Research Application (E6(R2) 4.5)** |  |
| As the investigator, I will: * conduct the research in compliance with the protocol agreed to by the sponsor, and with the research application that was given approval by the IRB. As the investigator, I must sign the research application to confirm agreement. *(4.5.1)*
* ensure that I will not implement any deviation from the IRB-approved research application without prior review and documented approval from the IRB of a modification. If necessary to eliminate an immediate hazard to research subjects, an investigator may deviate from the IRB-approved research application without prospective IRB approval. *(4.5.2)*
* document and explain any deviation from the approved protocol that occurs without prospective IRB approval. *(4.5.3)*
* if I deviate from or change the IRB-approved research application to eliminate an immediate hazard(s) to research subjects without prospective IRB approval, I will submit a modification and explain the deviation or change to:
	1. the IRB for review and approval,
	2. the sponsor for agreement and, if required,
	3. the regulatory authority(ies). Please consult with the IRBMED prior to reporting to any external regulatory authority *(4.5.4)*
 | These ICH E6(R2) elements are covered in the following study-related materials: Items 4.5.1 -4.5.4: Investigator Assurance Statement in the approved eResearch IRB application |
| **Investigational Product(s) (E6(R2) 4.6)** |  |
| As the investigator, I (or an appropriately qualified designee) will:* take responsibility for investigational product(s) accountability at the research site(s). *(4.6.1)*
* assign some or all of my duties for investigational product(s) accountability at the research site(s) to an appropriate pharmacist or another appropriate individual who is under my supervision. *(4.6.2)*
* maintain or assure the maintenance of records of the product's delivery to the research site, the inventory at the site, the use by each subject, and the return to the sponsor or alternative disposition of unused product(s). These records should include dates, quantities, batch/serial numbers, expiration dates (if applicable), and the unique code numbers assigned to the investigational product(s) and research subjects. Investigators should maintain records that document adequately that the subjects were provided the doses specified by the protocol and reconcile all investigational product(s) received from the sponsor. *(4.6.3)*
* ensure that the investigational product(s) are stored as specified by the sponsor (see *5.13.2* and *5.14.3* <Sponsor> Responsibilities) and in accordance with applicable regulatory requirement(s). *(4.6.4)*
* ensure that the investigational product(s) are used only in accordance with the IRB-approved research application. *(4.6.5)*
* explain the correct use of the investigational product(s) to each subject. I will check, at intervals appropriate for the trial, that each subject is following the instructions properly. *(4.6.6)*
 | These ICH E6(R2) elements are covered in the following study-related materials: Items 4.6.1 – 4.6.5: Approved eResearch IRB applicationItem 4.6.6: Informed consent document |
| **Randomization Procedures and Unblinding (E6(R2) 4.7)** |  |
| * As the investigator, I will follow the trial's randomization procedures, if any. I will ensure that the code is broken only in accordance with the IRB-approved research application. If the research is blinded, I will promptly document and explain to the sponsor any premature unblinding (e.g., accidental unblinding, unblinding due to a serious adverse event) of the investigational product(s).
 | These E6(R2) statements are specific to ICH GCP; review carefully. |
| **Informed Consent of Trial Subjects (E6(R2) 4.8)** *NOTE:* ***bolded E6(R2) Items*** *are different from FDA and HHS requirements*  |  |
| As the investigator, I (or an appropriately qualified designee) will:* comply with the applicable regulatory requirement(s) and adhere to GCP and to the ethical principles that have their origin in the Declaration of Helsinki in obtaining and documenting informed consent. Prior to the beginning of the research study, the investigator must have the IRB's written approval of the written informed consent form and any other written information to be provided to subjects. *(4.8.1)*
* ensure that the written informed consent form and any other written information to be provided to subjects will be revised whenever important new information becomes available that may be relevant to the subject's consent. Any revised consent form and other written information provided to subjects must receive the IRB’s approval in advance of use. The subject or the subject's legally acceptable representative should be informed in a timely manner if new information becomes available that may be relevant to the subject's willingness to continue participation in the research, and the communication of this information should be documented. *(4.8.2)*
* ensure that neither I nor the research staff will coerce or unduly influence a subject to participate or to continue to participate in the research. *(4.8.3)*
* ensure that none of the oral and written information concerning the trial, including the written informed consent form, contains any language that causes the subject or the subject's legally acceptable representative to waive or to appear to waive any legal rights, or that releases or appears to release the investigator, the institution, the sponsor, or their agents from liability for negligence. *(4.8.4)*
* ensure that I will fully inform the subject or, if the subject is unable to provide informed consent, the subject's legally acceptable representative, of all pertinent aspects of the research including the written information and the approval by the IRB. *(4.8.5)*
* ensure that the language used in the oral and written information about the research, including the consent form, will be as non-technical as practical and will be understandable to the subject or the subject's legally acceptable representative and the **impartial witness**, where applicable. *(4.8.6)*
* ensure that I or by designee will provide the subject or the subject's legally acceptable representative ample time and opportunity to inquire about details of the trial and to decide whether or not to participate in the research. All questions about the trial should be answered to the satisfaction of the subject or the subject's legally acceptable representative. *(4.8.7)*
* ensure that the **written consent form is signed and personally dated by the subject or by the subject's legally acceptable representative, and by the person who conducted the informed consent discussion prior to a subject's participation in any research procedures.** *(4.8.8)*
* ensure that, if a subject is unable to read or if a legally acceptable representative is unable to read, an **impartial witness** will be present during the entire informed consent discussion. After the written informed consent form, and any other written information to be provided to subjects, is read and explained to the subject or the subject's legally acceptable representative, and after the subject or the subject's legally acceptable representative has orally consented to the subject's participation in the trial and, if capable of doing so, has signed and personally dated the informed consent form, the witness should sign and personally date the consent form. By signing the consent form, the witness attests that the information in the consent form and any other written information was accurately explained to, and apparently understood by, the subject or the subject's legally acceptable representative, and that informed consent was freely given by the subject or the subject's legally acceptable representative. *(4.8.9)*
* ensure that, the informed consent discussion and the written informed consent form and any other written information to be provided to subjects should include explanations of the following:
1. *The trial involves research.*
2. *The purpose of the trial.*
3. *The trial treatment(s) and* ***probability for random assignment*** *to each treatment.*
4. *The trial procedures to be followed, including all invasive procedures.*
5. ***The subject’s responsibilities.***
6. *Those aspects of the trial that are experimental.*
7. *The reasonably foreseeable risks or inconveniences to the subject and, when applicable, to an embryo, fetus, or nursing infant.*
8. ***The reasonably expected benefits. When there is no intended clinical benefit to the subject, the subject should be made aware of this.***
9. ***The alternative procedure(s) or course(s) of treatment that may be available to the subject, and their important potential benefits and risks.***
10. *The compensation and/or treatment available to the subject in the event of trial-related injury.*
11. ***The anticipated prorated payment, if any, to the subject for participating in the trial****.*
12. *The anticipated expenses, if any, to the subject for participating in the trial.*
13. *That the subject's participation in the trial is voluntary and that the subject may refuse to participate or withdraw from the trial, at any time, without penalty or loss of benefits to which the subject is otherwise entitled.*
14. *That the monitor(s), the* ***auditor(s), the IRB****, and the regulatory authority(ies) will be granted direct access to the subject's original medical records for verification of clinical trial procedures and/or data, without violating the confidentiality of the subject, to the extent permitted by the applicable laws and regulations and that, by signing a written informed consent form, the subject or the subject's legally acceptable representative is authorizing such access.*
15. *That records identifying the subject will be kept confidential and, to the extent permitted by the applicable laws and/or regulations, will not be made publicly available.* ***If the results of the trial are published, the subject’s identity will remain confidential.***
16. *That the subject or the subject's legally acceptable representative will be informed in a timely manner if information becomes available that may be relevant to the subject's willingness to continue participation in the trial.*
17. *The person(s) to contact for further information regarding the trial and the rights of trial subjects, and whom to contact in the event of trial-related injury.*
18. *The foreseeable circumstances and/or reasons under which the subject's participation in the trial may be terminated.*
19. *The expected duration of the subject's participation in the trial.*
20. *The approximate number of subjects involved in the trial. (4.8.10)*
* ensure that, prior to participation in the research, the subject or the subject's legally acceptable representative ***will receive a copy of the signed and dated consent form*** and any other written information provided to the subject. During a subject's participation in the research, the subject or the subject's legally acceptable representative ***should receive a copy of the signed and dated revised consent form*** and a copy of any updates to the written information provided to subjects. *(4.8.11)*
* ensure that when research (therapeutic or non-therapeutic) includes subjects who can only be enrolled in the research with the consent of the subject's legally acceptable representative (e.g., minors, or patients with severe dementia), the subject will be informed about the research to the extent compatible with the subject's understanding and, if capable, the subject will be given the opportunity to sign and personally date the written informed consent. *(4.8.12)*
* ensure that, except as described in 4.8.14 (below), non-therapeutic research (i.e., research in which there is no anticipated direct clinical benefit to the subject), will be conducted in subjects who personally give consent and who sign and date the written informed consent form. *(4.8.13)*
* Non-therapeutic research may be conducted in subjects with consent of a legally acceptable representative provided the following conditions are fulfilled:
1. The objectives of the research cannot be met by means of research in subjects who can give informed consent personally.
2. The foreseeable risks to the subjects are low.
3. The negative impact on the subject's well-being is minimized and low.
4. The research is not prohibited by law.
5. The approval of the IRB is expressly sought on the inclusion of such subjects, and the IRB’s written approval covers this aspect.

Such research, unless an exception is justified, should be conducted in patients having a disease or condition for which the investigational product is intended. Subjects in these studies should be particularly closely monitored and should be withdrawn if they appear to be unduly distressed. *(4.8.14)** As the investigator, I will ensure that in emergency situations, when prior consent of the subject is not possible, the consent of the subject's legally acceptable representative, if present, will be requested. When prior consent of the subject is not possible, and the subject's legally acceptable representative is not available, enrollment of the subject requires measures described in the research application and/or elsewhere, with documented IRB approval to protect the rights, safety, and well-being of the subject and to ensure compliance with applicable regulatory requirements. The subject or the subject's legally acceptable representative must be informed about the research as soon as possible and consent to continue and other consent as appropriate (see 4.8.10 above) should be requested. *(4.8.15)*
 | These statements (E6(R2) Items 4.8.1 – 4.8.5) are specific to ICH GCP; review carefully.These ICH E6(R2) elements are covered in the following study-related materials: Items 4.8.6 to 4.8.11: Informed consent documentPlease see Help Text for ICH-GCP specific requirements in the IRBMED informed consent template.Item 4.8.12: Approved eResearch IRB application These statements (E6(R2) Items 4.8.13 – 4.8.15) are specific to ICH GCP; review carefully. |
| **Records and Reports (E6(R2) 4.9)** |  |
| As the investigator, I will:* maintain adequate and accurate source documents and trial records that include all pertinent observations on each of the site’s trial subjects. Source data should be attributable, legible, contemporaneous, original, accurate, and complete. Changes to source data should be traceable, should not obscure the original entry, and should be explained if necessary (e.g., via an audit trail). *(4.9.0)*
* ensure the accuracy, completeness, legibility, and timeliness of the data reported to the sponsor in the CRFs and in all required reports. *(4.9.1)*
* ensure that data reported on the CRF derived from source documents are consistent with the source documents. If there are any discrepancies, they will be explained. *(4.9.2)*
* retain records of the changes and corrections to CRF(s). I will ensure that any change or correction to a CRF will be dated, initialed, and explained (if necessary) and will not obscure the original entry (i.e., an audit trail should be maintained). This applies to both written and electronic changes or corrections (see 5.18.4(n) Sponsor Responsibilities). Sponsors should provide guidance to investigators and/or the investigators' designated representatives on making such corrections. Sponsors should have written procedures to assure that changes or corrections in CRFs made by sponsor's designated representatives are documented, are necessary, and are endorsed by the investigator. . *(4.9.3)*
* maintain the Essential Documents for the Conduct of a Clinical Trial**\*** as required by the applicable regulatory requirement(s). The investigator should take measures to prevent accidental or premature destruction of these documents. *(4.9.4)*
* ensure that Essential Documents**\*** will be retained until at least 2 years after the last approval of a marketing application in an ICH region and until there are no pending or contemplated marketing applications in an ICH region or at least 2-years have elapsed since the formal discontinuation of clinical development of the investigational product. If required by the applicable regulatory requirements or by an agreement with the sponsor, these documents may need to be retained for a longer period. It is the sponsor’s responsibility to inform the investigator as to when these documents no longer need to be retained (see *5.5.12* Sponsor Responsibilities). *(4.9.5)*
* ensure that the financial aspects of the study are documented in an agreement between myself and the sponsor. *(4.9.6)*
* make available for direct access all requested research-related records upon request of the monitor, auditor, IRB, or regulatory authority. *(4.9.7)*
 | These statements (E6(R2) Items 4.9.0, 4.9.1, 4.9.2, and 4.9.3) are specific to ICH GCP; review carefully.These ICH E6(R2) elements are covered in the following study-related materials: Items 4.9.4 and 4.9.5: Approved eResearch IRB applicationRegarding Essential Documents**\***, see Note below these tables.Item 4.9.6: eResearch Proposal ManagementItem 4.9.7: Investigator Assurance Statement in the approved eResearch IRB application |
| **Progress Reports (E6(R2) 4.10)** |  |
| As the investigator, I will:* submit written summaries of the research status to the IRB annually, or more frequently if requested by the IRB. *(4.10.1)*
* promptly provide written reports to the sponsor, the IRB and, where applicable, the institution on any changes significantly affecting the conduct of the research, and/or increasing risks to subjects. *(4.10.2)*
 | These ICH E6(R2) elements are covered in the following study-related materials: Items 4.10.1 and 4.10.2: Investigator Assurance Statement in the approved eResearch IRB application |
| **Safety Reporting (E6(R2) 4.11)** |  |
| As the investigator, I will:* immediately report all serious adverse events (SAEs) to the sponsor, except for those SAEs that the protocol or other document (e.g., Investigator's Brochure) identifies as not needing immediate reporting. The immediate reports should be followed promptly by detailed, written reports. The immediate and follow-up reports should identify subjects by unique code numbers assigned to the research subjects rather than by the subjects' names, personal identification numbers, and/or addresses. As the investigator, I will also comply with the applicable regulatory requirement(s) related to the reporting of unexpected serious adverse drug reactions to the IRB and regulatory authority(ies). *(4.11.1)*
* report adverse events and/or laboratory abnormalities identified in the protocol as critical to safety evaluations to the sponsor according to the reporting requirements and within the time periods specified by the sponsor in the protocol. *(4.11.2)*
* supply the sponsor and the IRB with any additional requested information for reported deaths (e.g., autopsy reports and terminal medical reports). *(4.11.3)*
 | These ICH E6(R2) elements are covered in the following study-related materials: Items 4.11.1 – 4.11.3: Approved eResearch IRB application |
| **Premature Termination or Suspension of a Trial (E6(R2) 4.12)** |  |
| As the investigator, I confirm:* If the trial is prematurely terminated or suspended for any reason, I will promptly inform the trial subjects, assure appropriate therapy and follow-up for the subjects, and, where required by the applicable regulatory requirement(s), inform the regulatory authority(ies).
* If I terminate or suspend research without prior agreement of the sponsor, I will inform the sponsor and the IRB. The investigator should provide the sponsor and the IRB with a detailed written explanation of the termination or suspension. *(4.12.1)*
* If the sponsor terminates or suspends a trial, as the investigator, I will promptly inform the IRB and provide a detailed written explanation of the termination or suspension. *(4.12.2)*
* If the IRB terminates or suspends its approval of my research, I will notify the sponsor and provide the sponsor with a detailed written explanation of the termination or suspension. *(4.12.3)*
 | These ICH E6(R2) elements are covered in the following study-related materials: Items 4.12.1 – 4.12.3: Investigator Assurance Statement in the approved eResearch IRB application |
| **Final Report(s) by Investigator (E6(R2) 4.13)** |  |
| * As the investigator, I attest that upon completion of the research, I will inform the IRB and provide a summary of the research results, and provide any reports required by the regulatory authority(ies).
 | This E6(R2) statement is specific to ICH GCP; review carefully. |

\* Essential Documents are those documents which 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 Good Clinical Practice and with all applicable regulatory requirements. In the ICH-GCP E6(R2) document available at <https://www.ich.org/page/efficacy-guidelines> **Section 8 Essential Documents for the Conduct of a Clinical Trial** (pages 45 and following ) comprises a tabular listing of the Essential Documents, along with who is responsible for maintaining each document, and at what stage(s) in the trial the document is necessary. IRBMED recommends consulting these tables.