



**MU Guidance for Investigators When Studies Require Compliance with the
International Conference on Harmonisation (ICH) Guideline for
Good Clinical Practice (GCP) (E6)(R2)**

MU HRPP Roles and Responsibilities SOP

The SOP states “Guidance set forth by the International Conference on Harmonization (ICH)/Good Clinical Practice (GCP) is applied to industry sponsored studies with contract requirements for institutional adherence.” To further clarify this statement, MU HRPP expects MU investigators follow the guideline when the PI indicates in the application that the sponsor requires the IRB review process to comply with ICH-GCP, and the requirement is confirmed in a contract.

The FDA states the ICH-GCP guidance should be followed when generating clinical trial data intended to be submitted to regulatory authorities. This would apply to studies involving drugs and/or biologics. FDA Guidance: <https://www.fda.gov/media/93884/download>

It is possible an investigator may choose to adhere to ICH-GCP, but the MU HRPP/IRB will not enforce the guideline if not contractually required.

ICH-GCP Requirements

The MU IRB will require the investigator to attest to meeting the requirements below, and where applicable, ensure information is included in the IRB submission:

Adequate Support:

The available nonclinical and clinical information on an investigational product is adequate to support the proposed clinical trial.

Consent Disclosures:

1. The approval or favorable opinion by the IRB.
2. The probability for random assignment to each treatment.
3. The participant's responsibilities.
4. When applicable, the reasonably foreseeable risks or inconveniences to an embryo, fetus, or nursing infant.

5. The important potential benefits and risks of the alternative procedures or courses of treatment that may be available to the participant.
6. When there is no intended clinical benefit to the participant, the participant should be made aware of this.
7. A statement that the monitors, the auditors, the IRB, and the regulatory authorities will be granted direct access to the participant's original medical records for verification of clinical trial procedures and data, without violating the confidentiality of the participant, to the extent permitted by the applicable laws and regulations and that, by signing a written informed consent form, the participant or the participant's legally authorized representative is authorizing such access.
8. If the results of the trial are published, the participant's identity will remain confidential.
9. The researcher informs the participant's primary physician about the participant's participation in the clinical trial if the participant has a primary physician and if the participant agrees to the primary physician being informed.

Adults unable to Consent

When adults are unable to consent, the IRB must determine:

- (i) A non-therapeutic clinical trial (i.e., a trial in which there is no anticipated direct clinical benefit to the participant) should be conducted in participants who personally give consent and who sign and date the written consent document.
- (ii) Non-therapeutic clinical trials may be conducted in participants with consent of a legally acceptable representative provided the following conditions are fulfilled:
 - (A) The objectives of the clinical trial cannot be met by means of a trial in participants who can give consent personally
 - (B) The foreseeable risks to the participants are low
 - (C) The negative impact on the participant's well-being is minimized and low
 - (D) The clinical trial is not prohibited by law; and
 - (E) The opinion of the IRB or EC is expressly sought on the inclusion of such participants, and the written opinion covers this aspect. Such trials, unless an exception is justified, should be conducted in patients having a disease or condition for which the investigational product is intended. Participants in these trials should be particularly closely monitored and should be withdrawn if they appear to be unduly distressed.

Planned Emergency Research with a Waiver of Consent

The participant or the participant's legally authorized representative is informed about the clinical trial as soon as possible and provides consent if the participant wishes to continue.

Documentation of the Consent Process Include:

1. Prior to a participant's participation in the trial, the written consent document should be signed and personally dated by the participant or by the participant's legally acceptable representative.

2. Prior to a participant's participation in the trial, the written consent document should be signed and personally dated by the person who conducted the informed consent discussion.
3. If a participant is unable to read or if a legally acceptable representative is unable to read, an impartial witness should be present during the entire informed consent discussion.
 - a. After the written consent document and any other written information to be provided to participants is read and explained to the participant or the participant's legally acceptable representative, and after the participant or the participant's legally acceptable representative has orally consented to the participant's participation in the trial and, if capable of doing so, has signed and personally dated the consent document, the witness should sign and personally date the consent document.
 - b. By signing the consent document, the witness attests that the information in the consent document and any other written information was accurately explained to, and apparently understood by, the participant or the participant's legally acceptable representative, and that consent was freely given by the participant or the participant's legally acceptable representative.
 - c. Prior to participation in the trial, the participant or the participant's legally acceptable representative should receive a copy of the signed and dated written consent document and any other written information provided to the participants.

Employing Sound Study Design

1. The scientific review process evaluates the soundness of the research design, and the ability of the research to answer the proposed questions.
2. During and following a participant's participation in a clinical trial, the researcher ensures that adequate medical care is provided to a participant for any adverse events, including clinically significant laboratory values, related to the clinical trial.
3. The researcher follows the clinical trial's randomization procedures, if any, and ensures that the code is broken only in accordance with the protocol. If the clinical trial is blinded, the researcher promptly documents and explains to the Sponsor any premature unblinding.
4. A qualified physician (or dentist, when appropriate), who is a researcher or a co-researcher for the clinical trial, is responsible for all clinical trial-related medical (or dental) decisions.
5. Researchers inform participants when medical care is needed for other illnesses of which the researchers become aware.

Qualifications – Training and Experience

1. The researcher is familiar with the appropriate use of the investigational product, as described in the protocol, in the current investigator's brochure, in the product information, and in other information sources provided by the sponsor.

2. The researcher ensures the accuracy, completeness, legibility, and timeliness of the data reported to the sponsor.
3. The researcher permits monitoring and auditing by the sponsor and inspection by the appropriate regulatory authority.
4. The researcher maintains the clinical trial documents as specified in Essential Documents for the Conduct of a Clinical Trial and as required by the applicable regulatory requirements.

Appropriate Oversight

The researcher must maintain a list of appropriately qualified persons to whom they have delegated significant clinical trial-related duties.

Control of Investigational Products

1. A description of the manufacturing, handling, and storage in accordance with applicable good manufacturing practice.
2. Where allowed or required, the researcher or organization assigns some or all duties for investigational articles accountability at the clinical trial sites to an appropriate pharmacist or another appropriate individual who is under the supervision of the researcher or organization.
3. The researcher, pharmacist, or other designated individual maintains records of the product's delivery to the clinical trial site, the inventory at the site, the use by each participant, and the return to the sponsor or alternative disposition of unused products. These records include dates, quantities, batch or serial numbers, and expiration dates (if applicable), and the unique code numbers assigned to the investigational products and trial participants.
4. The researcher maintains records that document adequately that the participants are provided the doses specified by the protocol and reconcile all investigational products received from the sponsor.

Reporting Requirements

1. The researcher reports 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 researcher follows regulatory requirements related to the reporting of unexpected serious adverse drug reactions to the regulatory authority and the IRB.
2. The researcher reports adverse events 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.
3. For reported deaths, the researcher supplies the sponsor and the IRB with any additional requested information (e.g., autopsy reports and terminal medical reports).
4. The researcher provides written reports to the sponsor, the IRB, and, where applicable, the organization on any changes significantly affecting the conduct of the clinical trial or increasing the risk to participants.

5. If the researcher terminates or suspends a clinical trial without prior agreement of the sponsor, the researcher informs the organization, sponsor, and the IRB.
6. If the IRB terminates or suspends approval of the clinical trial, the researcher promptly notifies the sponsor.
7. Upon completion of the clinical trial, the researcher informs the organization; the IRB with a summary of the trial's outcome; and the regulatory authority with any reports required.

Reporting Requirements to IRB

1. New information that may affect adversely the safety of the participants or the conduct of the clinical trial.
2. Any changes significantly affecting the conduct of the clinical trial or increasing the risk to participants.

Subject Withdrawals

Although a participant is not obliged to give his or her reasons for withdrawing prematurely from a clinical trial, the researcher makes a reasonable effort to ascertain the reason, while fully respecting the participant's rights.