Principal Investigator and Sub-Investigator Responsibilities

I. Purpose
To define the roles and responsibilities of Principal Investigators conducting research at GRU.

II. Definition
The term Principal Investigator (PI) is defined as the individual under whose immediate direction the research activities (i.e., focus group, survey, and drug or device trial) occur. It is the current policy of the Georgia Regents University (GRU) to allow only one PI on a study. The term Co-PI is currently not recognized at this institution. The term Project Director is synonymous with PI.

III. Responsibilities - General

- The GRU Institutional Review Board (IRB) requires the Principal Investigator (PI) to have the appropriate background and training to conduct the research required for each study.

- PIs must also be on the GRU medical, professional staff or be a member of the faculty of one of the institutions affiliated with GRU.

- Professionals in training (i.e. students, resident physicians) are permitted to be Principal Investigators, but they must have a Faculty Sponsor.

- Fellows may be principal investigators if they have attending privileges at GRU, or have a Faculty Sponsor. Additionally, the GRU IRB may require that a licensed physician and appropriate expertise be substantially involved with the research project, particularly if the research study or procedures are greater than minimal risk.

- The PI is responsible for the design and implementation of ethical research, consistent with three ethical principles outline in the Belmont Report:
  - Respect for Persons (individual autonomy; protection of individuals with reduced autonomy)
  - Beneficence (Maximize benefits and minimize harms)
  - Justice (equitable distribution of research costs and benefits)

- The PI is responsible for personally conducting or supervising the conduct of human-subjects research and for protecting the rights, safety, and welfare of the subjects enrolled in the research.

- The PI must ensure that all human-subjects research is conducted in an ethical manner and in accordance with all applicable federal, state, and local laws and regulations, institutional policies, and requirements or determinations of the Georgia Regents University (GRU) impacting the protection of human subjects 45 CFR 46; 45 CFR 46 Subpart B; 45 CFR 46 Subpart C; 45 CFR 46 Subpart D; 21 CFR 56; 21 CFR 50.

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The PI has the responsibility to ensure that the protocol design anticipates potential harm to the study subject and that procedures are in place to mitigate any harm that may be caused to study participants.

The PI has the ultimate responsibility for oversight of all research he/she is conducting and is ultimately responsible for all communication with the IRB regarding that research. All official IRB correspondence is directed to the PI. The PI may request that another member of the research staff also receive communication from the IRB; however, it is the Principal Investigator who is responsible for all aspects of the research protocol.

The PI must provide the office of the IRB with current contact information including mailing address, telephone number, fax number and email address. The PI must promptly inform the office whenever there is a change in this information.

The PI must notify the IRB prior to terminating institutional affiliation and transition the studies to another PI or close any completed studies by submitting a final report. For studies that will remain open, plans should be to transition to a new PI. The IRB may request additional information from the PI or the sponsor to enable appropriate review of research applications.

**Responsibilities of Supervising the Conduct of Human-Subjects Research**

The PI is responsible for personally conducting or supervising the study. However, PIs are allowed to delegate certain study-related tasks to sub-investigators and study staff. The PI should have a plan for supervision and oversight of the research. The intensity of the supervision should take into consideration the study personnel conducting the research, the nature of the research, and the subject population.

When supervising the conduct of human subjects research the PI must ensure that:

- Study personnel are qualified by training and experience to perform study-related tasks that have been delegated to them;
- Supervision of study personnel occurs throughout the duration of the study

**Study Personnel Qualifications and Training**

The PI should:

- Ensure there is adequate training for all staff participating in the conduct of the study. The investigator should specifically anticipate the possibility of staff turnover during the conduct of the study (particularly if the study is of long duration) and plan to ensure that there is adequate training of any replacement staff.
- Have a specific understanding of the details of the protocol relevant to the tasks they will be performing and, when applicable, the investigational product;

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IRB Policy

- Ensure study personnel are aware of regulatory requirements and acceptable standards for the conduct of human-subjects research, both with respect to conduct of the study and human subject protection;

- Ensure study personnel follow the IRB-approved protocol, including the recruitment and consent procedures described in the protocol summary.

- Ensure study staff are informed of any pertinent changes to the protocol during the conduct of the study and are educated or given additional training as appropriate. If the sponsor provides training materials for investigators in the conduct of the study, the PI must ensure the staff receives and reviews these materials and/or participates as necessary in any in-person training sessions pertinent to their role in the study.

**Delegation of Duties and Supervision**

The PI should document all study-related duties for all research staff and ensure the document is updated as study staff and/or study procedures change. When tasks are delegated, the PI is responsible for providing adequate supervision of those to whom tasks are delegated and is accountable for regulatory violations resulting from failure to adequately supervise the conduct of the study.

When delegating tasks that are clinical or medical in nature, such as evaluating study subjects to assess clinical response to an investigational therapy (e.g. global assessment scales, vital signs) or providing study-related medical care to subjects, the PI must ensure that the individual has the relevant formal medical training and, when appropriate, licensing and/or certification.

**Examples of inappropriate delegation include:**

- Screening evaluations, including obtaining medical histories and assessment of inclusion/exclusion criteria, conducted by individuals with inadequate medical training;
- Physical examinations performed by unqualified personnel;
- Evaluation of adverse events by individuals lacking appropriate medical training,
- Knowledge of the clinical protocol, and knowledge of the investigational product;
- Assessments of primary study endpoints (e.g., tumor response, global assessment scales) by individuals lacking appropriate medical training and knowledge of the protocol; or
- Informed consent obtained by individuals who lack the medical training, knowledge of the clinical protocol, or familiarity with the investigational product needed to be able to discuss the risks and benefits of a clinical trial with prospective subjects. Please note: individuals obtaining consent must receive IRB approval prior to participating the informed consent process with a subject.

The PI must have a detailed plan for the supervision and oversight of a study. Supervision and oversight should be provided even for individuals who are highly qualified and experienced.

A plan might include the following elements, to the extent they apply to a particular study:

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• Routine meetings with co-investigators and study staff to review progress of the study and update them on any changes to the study or other procedures;
• Routine meetings with the sponsor’s monitors;
• A procedure for correcting problems identified by co-investigators or study staff, outside monitors or auditors, or other parties involved in the conduct of a study;
• A procedure for documenting the performance of delegated tasks in a satisfactory manner and, when appropriate, verifying findings (e.g. observation of the performance of selected assessments or independent verification by repeating selected assessments);
• A procedure for ensuring the consent process is being conducted in accordance with federal regulations 45 CFR 46 and 21 CFR 50 and IRB requirements and that study subjects understand the nature of their participation, risks, etc.;
• A procedure for ensuring that information in source documents is accurately captured on the Data Collection Forms, Case Report Forms, or elsewhere as appropriate to the study;
• A procedure for dealing with data queries and discrepancies identified by the study monitor or other individuals responsible for oversight of the study; and/or
• Procedures for ensuring co-investigators and study staff comply with the IRB approved protocol and reporting requirements of the IRB and sponsor.

**Protecting the rights, safety, and welfare of research subjects**

• The PI or other identified qualified individual(s) must be available to provide (or direct where) the study subjects may receive reasonable medical care for any medical problems that arise during participation in the research that are, or could be, related to the research. Subjects should be informed whether financial support for such care is available.

• Additionally, when participation in the research might impact the subject’s health and/or medical care, the PI should inform the subject’s primary care physician about the subject’s participation in the research if the subject has a primary care physician and if the subject agrees to the primary care physician being informed.

• When protecting the rights, safety, and welfare of research subjects, the PI must ensure that:
  • The subject’s comprehension of the consent process and only enroll subjects’ who can demonstrate informed understanding of the research study.
  • PI or other identified, qualified individual(s) is able to provide study subjects with reasonable medical care for any adverse events, including clinically significant laboratory values, related to research. Subjects should be informed whether financial support for this care is available or if it is the responsibility of the subject and/or his/her insurance company
  • PI or another specific qualified individual is available to study subjects to answer questions or provide care during the conduct of the research; and PI and all research staff conducting the study adhere closely to the research plan, and inclusion/exclusion criteria, safety assessments, safety monitoring and reporting of adverse events and procedures to protect privacy of subjects and confidentiality of identifiable data, in order to minimize risks to subjects.

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The PI should not commence the research without adequate resources to protect subjects participating in the research and should stop the research if the resources necessary to protect subjects become unavailable. These resources might include research personnel, space, equipment, time, and availability of medical or psychological care for problems that arise during participation in the research.

The research is conducted in accordance with the IRB approved protocol, including, when applicable, the approved recruitment and consent procedures;

When informed consent is required, informed consent is obtained in accordance with federal regulations and approved by the IRB and is documented using the current IRB approved research consent form;

When drugs, biological products, and devices are being investigated or used, they are managed and controlled as required by institutional policy, and when applicable, FDA regulations 21 CFR 312 and 21 CFR 812;

When the Principal Investigator is the sponsor for investigational drug, biological products, or device protocols, the PI is responsible for all investigator and sponsor responsibilities as outlined in FDA regulations 21CFR312 and 21CFR812.

Changes to the IRB approved protocol and/or the research consent form are not initiated without prospective IRB approval unless necessary to eliminate apparent immediate hazards to the subject;

Unanticipated problems involving risks to subjects or others (including adverse events) are reported promptly to the IRB in accordance with IRB policy;

When applicable, Data and Safety Monitoring Board/Data Monitoring Committee or other monitoring group reports are submitted promptly to the IRB for review;

Continuing review is conducted prior to expiration of IRB approval in accordance with IRB policy and the federal regulations;

Should IRB approval lapse, research procedures, such as recruitment and enrollment of subjects, study procedures on currently enrolled subjects, review of health/medical records, collection of tissue or other samples, or analysis of data, are not conducted until the IRB re-approves the research or until special permission is obtained from the IRB to continue previously enrolled

When the research has been completed or is being closed out prior to completion, a final continuing review report is submitted to the IRB;

Notify the IRB office of any upcoming audits (sponsor, FDA or OHRP), and provide the IRB with a copy of the audit report. Notification of a routine monitoring visit is not required.
• Adequate and accurate research reports are kept and retained as required by the IRB and, when applicable, by the sponsor OHRP, or FDA.

• Research records are made available to the IRB, the sponsor, and when applicable, the DHHS-Office for Human Research Protections (OHRP), and the Food and Drug Administration (FDA) upon request for monitoring and oversight of the research.

• Investigators who initiate their own research may also act as the sponsor of the research. These investigators may hold the IND for a drug or IDE for a device. These investigators must also satisfy the federal regulatory and reporting requirements of a sponsor to the appropriate regulatory agency. Reporting to the IRB does not substitute for the investigator/sponsor responsibility of reporting to these bodies [21CFR312.3 (b)].

Sub-Investigator Responsibilities

The term Sub-Investigator (Sub-I) may include any other individual member of the research team. [21CFR 312.3] and is generally understood to mean those individuals engaged in the informed consent process or who will have a significant role in the design or conduct of the research.