From: Lee, Hunter on behalf of: OC GCP Questions
Sent: Monday, August 15, 2006 4:19 PM
To: [purged]
Subject: RE: Question on signatures on approval letters from IRBs

Dear [purged],

I am not sure that I understand why an approval letter would not be signed by the IRB. FDA's regulations at 21 CFR 56.115 require an institution or where appropriate an IRB to prepare and maintain adequate documentation of IRB activities including copies of all correspondence between the IRB and the investigators. If this correspondence is written, there should be a signature on the letters or some other way for you to verify they are from whom they purport to be from. If the letter is sent by email and it is sent from, for example, the IRB chairman's email account, there can be some reasonable assumption, I would think, that the letter is from the chairman. Perhaps I am misunderstanding what you are receiving. Perhaps if you made it clear to your investigators that approval letters will not be accepted unless they are signed or in some other way verified, it would place the onus on the investigators to ensure this documentation is complete earlier in the process. I would NOT start a study assuming that approval has been granted; valid documentation of that approval is needed before beginning a study.

I note that ICH E6, 5.15.1 states "The sponsor should ensure that it is specified in the protocol or other written agreement that the investigator(s)/institution(s) provide direct access to source data/documents for trial-related monitoring, audits, IRB/IEC review, and regulatory inspection." Section 5.11 describes the information the sponsor should obtain from the investigator/institution to confirm review by the IRB/IEC.

I'm sorry that I can't be more helpful.

Hunter

Hunter M. Lee
Senior Advisor for Human Subject Protection Policy
Good Clinical Practice Program, FDA
This communication does not constitute a written advisory opinion under 21 CFR 10.85, but rather is an informal communication under 21 CFR 10.85(k) which represents the best judgment of the employee providing it. This information does not necessarily represent the formal position of FDA, and does not bind or otherwise obligate or commit the agency to the views expressed.

-----Original Message-----
From: [purged]
Sent: Thursday, August 03, 2006 9:08 AM
To: OC GCP Questions
Subject: Question on signatures on approval letters from IRBs
Importance: High

Dear All,

Just a quick question: what is the FDA's position regarding non-signed approval letters from IRBs. In Europe we only accept the approval letter when it is signed by the EC-IRB chair or his/her representative.

In the US we've been faced several times during the last months with approval letters from IRBs that are not signed by the chairman of the board, but is it valid without any signature from an IRB chair/member?

I went through the guideline and did realize that in cases of doubt the sponsor may check the IRB procedures, but how can we do that if they are not signed? We might ask them but it's time consuming and we don't know how it is perceived in the meantime with an approval not signed could we start the trial?

I would appreciate your help on this and thank you for your advice.

Best regards,

[purged]

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