From: Hommel, Carolyn - OC on behalf of OC GCP Questions
Sent: Wednesday, December 13, 2006 1:07 PM
To: [Redacted]
Subject: RE: question- Clinical protocol content

Dear [Redacted]:

See 21 CFR 312.23(a)(6)(iii); I've pasted it in here for your ready reference:

> (6) *Protocols.* (i) A protocol for each planned study. (Protocols for studies not submitted initially in the IND should be submitted in accordance with 312.30(a).) In general, protocols for Phase 1 studies may be less detailed and more flexible than protocols for Phase 2 and 3 studies. Phase 1 protocols should be directed primarily at providing an outline of the investigation--an estimate of the number of patients to be involved, a description of safety exclusions, and a description of the dosing plan including duration, dose, or method to be used in determining dose--and should specify in detail only those elements of the study that are critical to safety, such as necessary monitoring of vital signs and blood chemistries. Modifications of the experimental design of Phase 1 studies that do not affect critical safety assessments are required to be reported to FDA only in the annual report.
>
> (ii) In Phases 2 and 3, detailed protocols describing all aspects of the study should be submitted. A protocol for a Phase 2 or 3 investigation should be designed in such a way that, if the sponsor anticipates that some deviation from the study design may become necessary as the investigation progresses, alternatives or contingencies to provide for such deviation are built into the protocols at the outset. For example, a protocol for a controlled short-term study might include a plan for an early crossover of nonresponders to an alternative therapy.
>
> (iii) A protocol is required to contain the following, with the specific elements and detail of the protocol reflecting the above distinctions depending on the phase of study:
>
> (*a*) A statement of the objectives and purpose of the study.
>
> (*b*) The name and address and a statement of the qualifications (curriculum vitae or other statement of qualifications) of each investigator, and the name of each subinvestigator (e.g., research fellow, resident) working under the supervision of the investigator; the name and address of the research facilities to be used; and the name and address of each reviewing Institutional Review Board.
>
> (*c*) The criteria for patient selection and for exclusion of patients and an estimate of the number of patients to be studied.

(*d*) A description of the design of the study, including the kind of control group to be used, if any, and a description of methods to be used to minimize bias on the part of subjects, investigators, and analysts.

(*e*) The method for determining the dose(s) to be administered, the planned maximum dosage, and the duration of individual patient exposure to the drug.

(*f*) A description of the observations and measurements to be made to fulfill the objectives of the study.

(*g*) A description of clinical procedures, laboratory tests, or other measures to be taken to monitor the effects of the drug in human subjects and to minimize risk.

So, in answer to your question, with the partial exception of your third bullet below (i.e., investigator's qualifications), the other items are not included in the list of things that FDA requires a study protocol to include.

Sincerely,

Carolyn Hommel
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Good Clinical Practice Program
Office of Science and Health Coordination
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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.

From: [Redacted]
Sent: Thursday, December 07, 2006 11:23 AM
To: OC GCP Questions
Subject: question- Clinical protocol content

Hello-

I have a question regarding protocol content. I have a CRO we will be using that states it is "required" to have the following as a part of an Appendix to the clinical (Phase 2 or 3) protocol:

- The Informed consent,
- Sponsor's commitments,

- investigators qualifications and responsibilities,
- Declaration of Helsinki ,
- The sample eCRFs.

I have never seen this as a “requirement” to be part of the protocol. Is this something new or upcoming? In my experience these are all documents necessary for the investigator to have to conduct a clinical trial, but are sent as stand-alone items, and possibly mentioned in the protocol, rather than being a part of the protocol itself.

Thank you in advance for your assistance.

Kind Regards-

[Redacted]