

# Investigator Guidance Series

University of Utah Institutional Review Board

## SPONSOR-INVESTIGATOR GUIDELINES AND RESPONSIBILITIES

### Description

A sponsor-investigator is someone who both initiates and actually conducts a clinical investigation. The sponsor-investigator may conduct the research alone or with others. Investigators who conduct studies involving an FDA test article and for which they hold the IND or IDE must abide by the same regulatory requirements as any other sponsor. For example, the FDA will hold the investigator to the same regulatory requirements as if they were an industry sponsor, regardless of whether the investigator has the same resources.

The sponsor-investigator is held responsible for all sponsor requirements such as annual reporting requirements, labeling requirements, and record keeping requirements. Some questions which may need to be considered are:

1. If a drug will be manufactured at the University of Utah, do you (or others) follow GMP?
2. Have the labs been inspected for compliance with GMP?
3. Do you have monitors for the conduct of the research?
4. Do you (and your co-investigators) maintain Conflict of Interest
5. Disclosures and the FDA 1572 form on all investigators?
6. Should the sponsor functions be outsourced to a CRO so you are only responsible to abide by the federal requirements for investigators?

The FDA regulatory requirements for sponsors can be found in the Code of Federal Regulations. The following is a list that a sponsor-investigator may need to comply with.

### Drugs or devices:

- [21 CFR §11](#) (Electronic records and electronic signature)
- [21 CFR §54](#) (Financial Disclosure by Clinical Investigators)

### Drugs and Biologics:

- [21 CFR §210](#) (Current Good Manufacturing Practice In Manufacturing, Processing, Packing, Or Holding of Drugs; General)
- [21 CFR §211](#) (Current Good Manufacturing Practice for Finished Pharmaceuticals)
- [21 CFR §312](#) (Investigational New Drug Application)
- [21 CFR §314](#) (Drugs for Human Use)
- [21 CFR §320](#) (Bioavailability and Bioequivalence Requirements)
- [21 CFR §330](#) (Over-The-Counter (OTC) Human Drugs Which are Generally Recognized as Safe and Effective and Not Misbranded)
- [21 CFR §601](#) (Biologics Licensing)

### Devices:

- [21 CFR §807](#) (Establishment Registration and Device Listing for Manufacturers and Initial Importers Of Devices)
- [21 CFR §812](#) (Investigational Device Exemptions)
- [21 CFR §814](#) (Premarket Approval of Medical Devices)
- [21 CFR §820](#) (Quality System Regulation)
- [21 CFR §860](#) (Medical Device Classification Procedures)

The University of Utah IRB will require that sponsor-investigators submit within their IRB application a monitoring plan or standard operating procedures describing how they will fulfill all the additional requirements of sponsors. The sponsor-investigator will be required to provide all supporting documentation from the FDA.

Please contact the IRB Office at (801) 581-3655 or [irb@hsc.utah.edu](mailto:irb@hsc.utah.edu) for additional guidance.

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- The IRB has provided policies and procedures templates for drug/biologic and device studies. These templates can be accessed at on the [HIPAA Form page](#).

Sponsor-investigators must provide documentation of an audit performed by a CRO or an ad-hoc qualified auditor before the initiation of the study to verify the sponsor-investigator meets the sponsor function. The sponsor-investigator will also be held to the requirements declared in the University of Utah Hospitals and Clinics Policy Manual, Medication Management for Investigational Drugs.

If a sponsor-investigator out-sources the sponsor functions to a CRO, the sponsor-investigator must provide documentation that sponsor functions will be the responsibility of that CRO.

## References & Links

*Medical Devices – IRB  
Guidance*

<http://www.research.utah.edu/irb/guidelines/devices.html>

*Investigator  
Responsibility for Drug  
Studies*

[http://www.research.utah.edu/irb/guidelines/pdf/investresponse\\_drug.p  
df](http://www.research.utah.edu/irb/guidelines/pdf/investresponse_drug.pdf)

*Investigator  
Responsibilities for  
Device Studies*

[http://www.research.utah.edu/irb/guidelines/pdf/investresponse\\_device  
.pdf](http://www.research.utah.edu/irb/guidelines/pdf/investresponse_device.pdf)

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