

STANDARD OPERATING PROCEDURES (SOPs): PROTOCOL VIOLATIONS BY STUDY PERSONNEL

Policy: The investigational pharmacy provides service for drug-related research protocols and is responsible for establishing standard procedures for the appropriate control of investigational drugs and biologics used in human subject research.

Purpose: The investigational pharmacy staff is to utilize a standard procedure for handling and reporting protocol violations by study personnel, in accordance with applicable federal and state regulations, as well as good clinical practice guidelines.

Procedure:

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- Managing protocol violations occurring in the IDS pharmacy
 - 1. In the event of a potential violation/deviation of an HSR/IRBapproved protocol, the IDS pharmacist will report the concern to the study team/sponsor as appropriate.
 - The blind will be maintained as necessary. 2.
 - A description of the issue and its resolution will be documented and 3. kept on file.
 - All documentation will be forwarded to persons/entities as 4. appropriate.
 - 5. If deemed necessary, the IDS pharmacist will contact the HSR/IRB to ensure proper documentation and resolution of the issue. Once the issue is resolved, it will be reviewed during the IDS Pharmacist weekly meeting to discuss the issue and resolution and decide if study procedures or general SOPs need to be implemented or revised.

Applicable Regulations & Guidelines:

Joint Commission Standard MM.06.01.05 21 CFR 312.50 – General responsibilities of sponsors. 21 CFR 312.60 - General responsibilities of investigators. 21 CFR 312.66 – Assurance of IRB review.

Implemented: 10/2004 Revised: 09/2012, 6/2017