

**From:** [OC GCP Questions](#)  
**To:** [REDACTED]  
**Subject:** Documentation of communication between PI and study team  
**Date:** Tuesday, September 23, 2014 9:18:59 AM

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Good afternoon --

The expectation is that investigators, sub-investigators, and study staff will be knowledgeable about good clinical practice, including human subject protection, data integrity, recordkeeping, etc. and specific information that needs to be disseminated among study staff. How this information is documented would be up to the site and or institution where the research is being conducted. While not mandatory sponsors have discretion in determining what qualifications will be needed to conduct a study and may identify in the protocol a required frequency of GCP training, in which case the investigator and sub-investigators and study staff would be expected to meet that frequency of training in order to comply with the sponsors requirements. Every effort should be made to train the investigational sites and document the training.

Kind regards,

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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.

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**From:** GYXUM/XQ  
**Sent:** Monday, September 22, 2014 6:20 AM  
**To:** OC GCP Questions  
**Subject:** RE: Documentation of communication between PI and study team

**Dear Doreen,**

Thank you for the letter, but I am afraid that I have not described my question sufficiently.

My question related to the communication process between PI and study team, not to study team and subjects.

I am wondering how the clinically significant information provided to PI should be provided to the rest of the study team (for ex. Sub-Investigators, nurses and etc).

Should minutes of the meeting or updated training log be filed to ISF or it is not mandatory from the FDA's point of view?

Thank you in advance,