

**From:** [OC GCP Questions](#)  
**To:** [REDACTED]  
**Subject:** GCP Training Frequency  
**Date:** Friday, June 20, 2014 12:59:23 PM

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Good afternoon --

Neither FDA's regulations nor guidance provide guidelines on how often GCP training should be completed and by whom and who can perform the training. FDA does not require or provide certification. This would be up to the sponsor. The regulations require that sponsors choose investigators qualified by training and experience (see 21 CFR 312.53(a)). The regulations also require that investigators commit themselves to personally conduct or supervise the investigation (see 21 CFR 312.53(c)(1)(vi)(c)). FDA's guidance on Investigator Responsibilities - Protecting the Rights, Safety, and Welfare of Study Subjects (available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM187772.pdf>) states that, "The investigator should ensure that any individual to whom a task is delegated is qualified by education, training, and experience (and state licensure where relevant) to perform the delegated task."

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. Note that 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 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.

Additionally, FDA does have information about available GCP training on the GCP website, specifically at <http://www.fda.gov/ScienceResearch/SpecialTopics/RunningClinicalTrials/EducationalMaterials/ucm112925.htm>

Both the Center for Drug Evaluation (CDER) and the Center for Devices and Radiological Health (CDRH) provide online training relevant to clinical trials on their respective websites. These training programs are accessible at CDER Learn <http://www.fda.gov/Training/ForHealthProfessionals/default.htm> and CDRH (Center for Devices) Learn <http://www.fda.gov/Training/CDRHLearn/default.htm> respectively.

I hope this information is helpful. Please contact us again at [gcp.questions@fda.hhs.gov](mailto:gcp.questions@fda.hhs.gov) should you have additional questions.

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:** [redacted]  
**Sent:** Thursday, June 19, 2014 3:20 PM  
**To:** OC GCP Questions  
**Subject:** GCP Training Frequency

The Clinical Research Office is trying to implement a regularly scheduled GCP refresher training which would be required of all investigators. Is there any guidance/policy on what the appropriate frequency would be? Pharmaceutical sponsors are asking for annual and bi-annual retraining. We would like to

establish a policy based on best practices to allow our investigators to rely on a standard, instead of whatever a particular sponsor may require.

Thank you for any advice you can provide,  
[redacted]