

From: [OC GCP Questions](#)
To: [REDACTED]
Subject: Good clinical Practice
Date: Tuesday, October 14, 2014 12:35:54 PM

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.

While we cannot endorse/recommend non-government training entities, you may also find the courses provided by a number of the professional societies to be useful. These include: the Association of Clinical Research Professionals (ACRP) (<http://www.acrpnet.org/>), the Society of Clinical Research Associates (SoCRA) (<http://www.socra.org/>), the Regulatory Affairs Professionals Society (RAPS) (<http://www.raps.org/personifyebusiness/>), the Drug Information Association (DIA) (<http://www.diahome.org/DIAHome/Home.aspx>), and the Society of Quality Assurance (SQA) (<http://www.sqa.org/>). Several of these associations also have certification programs for clinical trial staff.

I hope this information is helpful. Please contact us again at 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.

From: [redacted]
Sent: Tuesday, October 14, 2014 12:20 PM
To: OC GCP Questions
Subject: Good clinical Practice

To whom it may concern:

I have been searching the fda.gov sight for your Good Clinical Practice course that provides a certificate when completed. I can not find the link where I can take this test. Can you help me out with this.

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