

Upon becoming aware of the FDA Inspection, the Research Coordinator should complete the following activities:

1. Notify key stakeholders:

- PI and study team members/co-investigators (the FDA may request to meet with any individual during the inspection)
- Sponsor
- CRO (as applicable)
- Upstate IRB and IRB of record (as applicable)
- Investigational Pharmacy
- Clinical Trials Office

2. Reserve a dedicated and lockable work space for the FDA agent, preferably away from research or clinical staff; provide access to a copier, phone and WIFI.

3. Prepare the following:

- A general overview of the study, including the eligibility criteria (the study coordinator and PI should be prepared to provide this verbally with a reasonable amount of detail);
- A detailed overview of the informed consent process. Any team member delegated to this activity may be asked to describe the process to the agent. May be asked to provide site-specific SOP;
- List of all study personnel and delegated responsibilities;
- List of SAEs with the timeline for when each was reported. This is for study personnel review and should only be provided upon request;
- List of all subjects enrolled, including name, study number, date enrolled and completed, medical record number;
- List of all subjects screened;
- If any enrolled subjects did not complete the study, be prepared to explain why;
- List of Principal Investigator's current active studies and all studies that were active during the last 5 years.

4. Gather and organize the following documents:

- Organize all Regulatory Files by general heading arranged in a chronologic order
 - Protocol, all versions
 - Investigator's Brochure, all versions
 - Informed Consent Form(s), all versions
 - Protocol Amendments

- Form FDA 1572 or Declaration of Investigator (device studies), all versions
- CVs for PI and Sub-investigators listed on all versions of Form FDA 1572 or Declaration of Investigator (device studies)
- Any corrective actions/CAPA activities put into place in response to protocol violations/errors
- Communications
 - Sponsor Correspondence
 - CRO Correspondence
 - Monitoring Logs
- IRB files
 - Approval Letters, for all actions
 - Approved Informed consents, all versions
 - Interim event reports and IRB acknowledgement letters
 - Be prepared to show the Agent items in IRBNet (do not share log-in or passwords)
- Laboratory
 - Laboratory Certification and normal ranges, or waiver as applicable
 - CV of laboratory director
- Drug Accountability- drug log to include:
 - Receipt of Drug
 - Dispensing
 - Return
- Device Accountability- device log to include:
 - Receipt of Device
 - Dispensing (where applicable, includes implants)
 - Return
- Subject Documents
 - Informed Consents for screened/enrolled subjects
 - Consents obtained prior to any study procedures?
 - Source documents for each subject enrolled (including labs, x-rays, scans, etc.)

5. For each subject enrolled review (and note any issues to discuss with PI):

- Inclusion/Exclusion Criteria
- Document reason for excluded subjects
- CRFs completed for each enrolled subject
- Source documentation for all CRF entries
- Data Clarification issues satisfied
- Consent obtained for all subjects screened/enrolled

- Verify correct version of Informed consent signed
- Confirm 'Notes to File' present as appropriate
- Condition of subject at time of entry into the study
- Concomitant medications
- Laboratory reports
- Diagnostic tests
- Dose Modifications
- Adverse Events/Deaths (were these reported on time)
- Protocol Exceptions
- Early Termination

6. When the FDA inspector arrives on site: (VERY IMPORTANT)

- Request to see credentials
- Show them to the assigned workspace. Provide a brief tour (restrooms, copier, where you will be or how to reach you)
- Only provide study data requested- don't volunteer extra information and limit chit chat.
- If you don't know the answer avoid the term "I don't know" instead respond with "I will get that for you" or "Let me check on that".