

From: [OC GCP Questions](#)
To: [REDACTED]
Subject: Updated 1572 Question
Date: Tuesday, November 11, 2014 2:47:16 PM

Good afternoon –

Yes you are correct. The FDA 1572 guidance states-
<http://www.fda.gov/downloads/RegulatoryInformation/Guidances/UCM214282.pdf>

7. When must a 1572 be updated or a new 1572 completed and signed by an investigator to reflect new or changed information?

There are two instances when it is necessary for an investigator to complete and sign a new 1572: when an investigator is participating in a new protocol that has been added to the IND and when a new investigator is added to the study (21 CFR 312.53(c)).

If there are other changes to information contained on a signed and dated 1572 (e.g., an IRB address change, the addition of new subinvestigators, the addition of a clinical research lab), the investigator should document the changes in the clinical study records and inform the sponsor of these changes, so that the sponsor can appropriately update the IND. The 1572 itself does not need to be revised and a new 1572 need not be completed and signed by the investigator. The sponsor can accumulate certain changes and submit this information to the IND in, for example, an information amendment or a protocol amendment.

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: Monday, November 10, 2014 12:25 PM
To: OC GCP Questions
Subject: Updated 1572 Question

Good Afternoon,

We are just wrapping up a phase IV study and we are being asked to update the 1572 using the newest version of the form (because of field 8) even though we have no changes to report.

I was under the impression that unless you have site changes that require update, if the study started prior to the newest version of the 1572 being released an update wasn't necessary.

Can you confirm this?

Best Regards,
[redacted]