Oversight of Clinical Investigations — A Risk-Based Approach to Monitoring

"Sponsors should prospectively identify critical data and processes that if inaccurate, not performed, or performed incorrectly, would threaten the protection of human subjects or the integrity of the study results. As examples, the following types of data and processes should ordinarily be identified as critical:

- Verification that informed consent was obtained appropriately
- Adherence to protocol eligibility criteria designed to exclude individuals for whom the investigational product may be less safe than the protocol intended and to include only subjects from the targeted study population for whom the test article is most appropriate
- Procedures for documenting appropriate accountability and administration of the investigational product (e.g., ensuring the integrity of randomization at the site level, where appropriate)
- Conduct and documentation of procedures and assessments related to
  - study endpoints
  - protocol-required safety assessments
  - evaluating, documenting, and reporting serious adverse events and unanticipated adverse device effects, subject deaths, and withdrawals, especially when a withdrawal may be related to an adverse event
- Conduct and documentation of procedures essential to trial integrity, such as ensuring the study blind is maintained, both at the site level and at the sponsor level, as appropriate, referring specified events for adjudication, and allocation concealment"

(http://www.fda.gov/downloads/Drugs/.../Guidances/UCM269919.p)