Use of Notes to File

VCU/VCU Health CLINICAL RESEARCH STANDARD OPERATING PROCEDURES

SOP No.: CR-CO-585.3	Status: Final	Version Date: 07/22/2025 Effective Date: 08/04/2025

1. PURPOSE

This Standard Operating Procedure establishes the standards for the use of notes-to-file as documentation during the conduct of research at VCU/VCU Health institutions, affiliates, or participating sites.

2. REQUIREMENTS

Investigators are required to maintain adequate and accurate study files and case histories per 21 CFR 312.62 and 21 CFR 812.140(a). Research project files should be documented and organized to present a project history that is detailed, accurate, and thorough. This history is represented through administrative documentation, case report forms, clinical source documentation, supporting data, and study-related forms. Should the project-related documentation fail to fully capture a study-related observation or occurrence, the event should be described in a note-to-file.

The use of notes-to-file should be minimal during the conduct of a research study and should never be used as a substitute for good, prospective, and complete source documents or Good Clinical Practice (GCP).

3. DEFINITIONS

Note-to-File- A note-to-file is a note or memo that documents and explains any study discrepancies and deviations or clarification of questionable data or study procedures that are not otherwise captured in source documentation.

Principal Investigator- The Principal Investigator (PI) is the individual with overall responsibility for the scientific, technical, financial, and regulatory direction and success of a project. The PI ensures that a project is carried out in compliance with federal, state, and local regulations and policies. The PI may delegate some duties to key research personnel; however, the ultimate responsibility for the management of the project rests with the PI.

Key Research Personnel- Key research personnel are individuals who are involved in the design and conduct of a research project including, but not limited to, Principal Investigators, Co-Investigators, Subinvestigators, research coordinators, and any other research team member who have contact with research participants and/or participants' research data and identifiers. Individuals whose primary contact with a research participant is in the context of

clinical care, but offer no additional role in research, are not considered key research personnel.

4. PROCESS

During the conduct of a research study, should it be necessary to provide additional information or clarification of an observation or occurrence in the absence of adequate source documentation, the following should be considered:

A. Any individual identified as key study personnel may write a note-to-file to provide additional information or clarification to a project-related observation or occurrence not otherwise captured in source documentation.

B. A note-to-file includes the following:
- Protocol and participant ID number if applicable
- Topic of note-to-file
- Date of note-to-file
- Detailed description of observation or occurrence, outcome if known and any followup
- As appropriate:
    - root cause/reason;
    - corrective action(s) taken to prevent recurrence or planned actions
    - description of how the problem was resolved

C. A note-to-file is considered source documentation and must be signed and dated by either the key study personnel making the entry or the person reviewing and/or validating information the document contains.

D. A note-to-file cannot be utilized in place of IRB reporting requirements (e.g., deviations, adverse events, unanticipated problems). A note-to-file may supplement such reports for clarity.

E. All notes-to-file must be filed in the regulatory binder and/or participant's research chart as appropriate.

5. REFERENCES

A. US Code of Federal Regulations
- 21 CFR 312.62 – Investigator Recordkeeping and Record Retention
- 21 CFR 812.140(a) – Investigator Records

B. VCU
- Note-to-file template- Located under Study Related Templates

Review/Revision History CR-CO-585		
Version No.	**Effective Date**	**Description**
CR-CO-585.3	08/04/2025	● Established SOP outlining appropriate use and limitations of notes-to-file in clinical research documentation Clarified that notes-to-file should not substitute for proper source documentation or GCP compliance ● Expanded requirements to include 21 CFR 812.140(a) ● Specified required elements for notes-to-file, including root cause, corrective actions, and resolution ● Defined role of key research personnel and PI in documentation ● Clarified that notes-to-file cannot replace IRB reporting requirements ● Added reference to institutional note-to-file template ● Aligned with FDA regulations and GCP standards ● Biennial review performed ● Minor formatting edits ● Reference links updated
CR-CO-585.2	06-01-2021	● Biennial review performed ● Minor formatting edits ● Reference links updated
CR-CO-585.1	06-01-2018	● Original