

**SOP: IRB RECORDS RETENTION**

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**1. PURPOSE**

- 1.1. This procedure establishes the process to retain IRB records.
- 1.2. This procedure begins every three months.
- 1.3. This procedure ends when all records that are no longer required to be retained are destroyed.

**2. POLICY**

- 2.1. Study files designated by legal counsel as being on “legal hold” are not to be destroyed until the legal hold is removed.
- 2.2. Study files relating non-exempt research which has not been conducted are retained for at least 3 years.
- 2.3. Study files relating to non-exempt research which has been conducted are retained for at least 3 years after completion of the research.
- 2.4. Study files relating to non-exempt research with no subject enrollment are retained for at least 3 years after completion of the research.
- 2.5. Study files relating to exempt research are retained for at least 3 years.
- 2.6. The following documents are retained indefinitely:
  - 2.6.1. IRB meeting minutes
  - 2.6.2. A resume or curriculum vitae for each IRB member
  - 2.6.3. Current and previous versions of IRB member rosters
  - 2.6.4. Current and previous versions of controlled documents

**3. RESPONSIBILITY**

- 3.1. HRPP staff members carry out these procedures.

**4. PROCEDURE**

- 4.1. Review the study files that can be destroyed.
  - 4.1.1. Omit destruction of records on a legal hold.
  - 4.1.2. Previously approved non-exempt studies: Three years after the date on which all research sites overseen by the [Organization]’s IRB have been completed either through closure, <Termination of IRB Approval>, disapproval, or lapse of approval
  - 4.1.3. Non-exempt studies never approved and exempt studies: Three years after the last IRB action or after withdrawal by the submitter
- 4.2. Shred paper documents and dispose the shredded materials securely.
- 4.3. Notify information technology to destroy electronic documents by either deleting the files or replacing the files with stub files documenting the date of deletion.
- 4.4. Document your name and the date of destruction with the following for each study file destroyed:
  - 4.4.1. Study title
  - 4.4.2. IRB ID
  - 4.4.3. Date of completion
  - 4.4.4. Paper, electronic, or both

**5. REFERENCES**

- 5.1. 21 CFR §56.115
- 5.2. 45 CFR §46.115