

 <p>Senior Associate Vice Chancellor for Health Sciences</p> <p>Office of Clinical Research</p>	SOP Number	OCR:013
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	Date:	04/02/2025
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	Approved by:	S. Little
SOP TITLE: STUDY CLOSEOUT AND REPORTING		

1 PURPOSE

- 1.1 This procedure establishes the process for Principal Investigators (PIs) and study personnel under the PI's supervision to follow to close a study with the IRB once all study activities have been completed.
- 1.2 The process begins when the PI or designee becomes aware that the study meets criteria for closure.
- 1.3 The process ends when the IRB closure acceptance letter has been received.

2 REVISIONS FROM PREVIOUS VERSION

- 2.1 None

3 REQUIREMENTS

- 3.1 A clinical study may be closed once all the following conditions are met:
 - 3.1.1 All recruitment and enrollment activities are complete
 - 3.1.2 All study procedures are complete
 - 3.1.3 All participant follow-up, including participant contact and/or review of medical records for research purposes, is complete
 - 3.1.4 All data analysis and manuscript preparation are complete
 - 3.1.4.1 If manuscript preparation involves analyzing data that includes identifiable private information, the study must remain open under IRB oversight. Continued use of identifiable data is considered human subjects research.
 - 3.1.4.2 If identifiers remain in existence and can be linked to the data to re-identify it, meaning if a code or link to direct identifiers exists, this is still human subjects research and requires IRB oversight.
 - 3.1.4.3 "De-identified" in the HIPAA context means that all 18 HIPAA identifiers, including all elements of dates, have been removed. "De-identified" in the IRB regulatory context means that data is not "readily" identifiable/cannot be linked to the individual from whom the data was collected.
 - 3.1.5 Analysis or research on identifiable biological specimens that are being maintained in a repository approved for the study is complete
 - 3.1.6 For sponsored research, the sponsor has given permission to close the study and, if applicable, has conducted the close out monitoring visit
- 3.2 [OIA-103 IRB Handbook "How do I close out a study?"](#) describes the process for submitting a closure request in the Kuali IRB electronic submission system. The [Knowledge Base Article "Steps to Submitting a Closure"](#) describes each step in the process.
- 3.3 The study closure request must be submitted at least 30 days before the IRB expiration date.

4 RESPONSIBILITIES

- 4.1 The PI or designee is responsible for tracking study activities to ensure that a timely study closure request is submitted to the IRB.

5 PROCEDURE

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- 5.1 Confirm that the study is ready for closure.
 - 5.1.1 Confirm that all source data have been verified, case report forms are complete, and relevant participant logs have been transmitted to the sponsor, if applicable.
 - 5.1.2 Verify that all data has been entered in the study database and that all data queries have been resolved.
 - 5.1.3 Verify that investigational product accountability is complete and accurate.
 - 5.1.4 Verify that investigational product has been returned to the sponsor, if applicable, or destroyed in accordance with the study protocol and the study contractual agreement, if applicable.
 - 5.1.5 For investigator-initiated studies, verify that any required results reporting in clinicaltrials.gov has been submitted and accepted in the Protocol Registration and Results System (PRS), as applicable.
 - 5.1.6 Ensure that all applicable activities in OCR-112- Sample Closeout Checklist have been completed.
- 5.2 Submit the closure request in the IRB electronic submission system prior to study expiration.
 - 5.2.1 For sponsored research, submit the sponsor's documentation giving permission to close the study.
 - 5.2.2 If UC San Diego IRB is relying on another IRB, submit the closure letter from the IRB of record with the UC San Diego IRB closure request.
- 5.3 File the IRB closure acceptance letter in the study file.

6 MATERIALS

- 6.1 [OCR-112 – Sample Closeout Checklist](#)

7 REFERENCES

- 7.1 [OIA-103 IRB Handbook “How do I close out a study?”](#)
- 7.2 [Knowledge Base Article “Steps to Submitting a Closure”](#)