Clinical Trail Monitoring, Auditing and Inspection Workshop– FDA, SFDA and Industry Perspective

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Clinical Trial Inspection in China

I. Objectives and requirements
II. Contents and procedure
III. Patterns of inspection
Objectives

- To comply with relevant regulations including GCP
- To obtain complete reliable information and data for clinical trials
- To protect to the maximum the rights, interests and safety of trial subjects

Important measures adopted by drug supervision and management authorities to regulate drug clinical research
Responsibilities of all parties

WHY, WHAT, WHO, HOW

• Medical institutes and researchers: different from regular doctors and patients
• Sponsor: monitoring and auditing
• Ethics Committee: reviewing
• Data Monitoring Committee: evaluation
• Regulatory authority: inspection

Design, process, record, analysis
GCP

Standards for the whole process of clinical trials
Including the design, implementation, monitoring, auditing, recording, analysis, summary and reporting of the trial.
GCP requirements for auditing and inspection

Article 39: The sponsor shall set up a quality-control and quality-guarantee system for the clinical trial, and ensure trial quality by organizing inspection of the clinical trial.

Article 61: The drug supervision and management authorities and the sponsor can ask auditors to conduct a systemic examination of relevant activities and documents of the clinical trials, to evaluate whether the trials are carried out according to the trial proposal, standard operation regulations and other relevant regulations, and whether trial data have been recorded in a timely, truthful, accurate and complete manner. The audits shall not be run by people directly involved in the clinical trial.

Article 64: The drug supervision and management authorities shall inspect the tasks and task-execution of researchers and the sponsor in the trial. Documents and files (including medical records) of the medical institutes and labs involved in the clinical trial shall also be subject to inspection of the drug supervision and management authorities.
Sponsor’s monitoring of clinical research

Monitoring
• Responsibility of the sponsor’s clinical research department
• Part of the clinical research department
• Regular monitoring of each research center
• Monitoring reports to be circulated within the department

Auditing
• Responsibility of the sponsor’s quality-guarantee department
• Independent from the clinical research department
• Sample auditing of important clinical research centers
• Auditing reports to be submitted to high-level management department of the company
• Audit refers to a systematic check-up, by people not directly involved in the trial, to evaluate whether the implementation, data recording and analysis of the trial are in accordance with the trial proposal, standard operation regulations and other regulations related to drug clinical trials.

• Inspection refers to drug supervision and management authorities’ official evaluation of the documents, implementation, recording and other aspects of a clinical trial. Inspection can take place in the trial institute, location of the sponsor, or venue of the contract research organization (CRO).
Audit
• Carried out either during or after the research
• Proposing improvement suggestion for the current trial
• Responsibility of sponsor
• Not all trial data have been obtained
• Objectiveness: to ensure the trial implementation and data are up to high standard

Inspection
• Usually carried out after the research
• Proposing improvement suggestion for future trials
• Responsibility of drug supervision and management authorities
• Usually all data have been obtained
• Judging whether the data can be used to fully evaluate drug effects and safety, and determining whether the drug can be allowed into the market
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1. Things to be inspected:

- Document
- Trial sites
- Compliance with the trial proposal
- Adverse events
- Data reliability
- Sponsor/CRO
2. Procedures of inspection

- Choosing which organization to inspect
- Formulating an inspection plan
- Notifying the organization to be inspected
- Inspecting process
- Inspection results and report
2. Procedure

Choosing which organization to inspect
- Random selection (phase I, II, III clinical trials)
- Those with too high or too low a selection ratio of trial subjects
- Those undertaking too many trial projects concurrently
- Abnormal safety and effectiveness results
- Problems that investigators pointed out for close attention
- Those whose expertise scope fails to cover the clinical trial
- Geographical location (being in the same city as other inspected organizations)
- Those with fault records
- Those whose clinical trial is suspected to have violated laws and regulations.
2. Procedure

Formulating an inspection plan:

- Fully understanding the inspection beforehand, reading carefully the trial proposal and relevant materials
- Inspection plan: inspection proposal, building an inspection team, deciding on the time, purpose and contents of the inspection
- Members of the inspection team
- Inspection notice
2. Procedure

- Inspecting process
- Inspection results and report
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Patterns of inspection:

- Regulation inspection
- “Event-driven” inspection
Thank you!