BCVI Clinical Trials Unit
FDA Audits

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Background

• BCVI participates in many device/IDE trials

• Our audits have been triggered by Pre- Market Application (PMA) submissions

• Routine inspections account for over 80% of the inspections performed each year

• Clinical Investigators who enroll the most subjects in the pivotal trial are the most likely to be inspected.
Preparing for the Inspection

When FDA calls to schedule an inspection, obtain the following information:

• FDA inspector name and contact information
• The name of the PI being inspected
• What studies are being inspected
• The reason for the inspection
• Does the FDA want specific personnel available
• Does the FDA want specific documents available
Preparing for the Inspection

• Document any telephone conversation(s) that occurs between the FDA inspector and the study staff
• Notify study staff, Sponsor, IRB
• The FDA inspector will usually request the inspection take place within 10 days
• Request the medical records for all subjects enrolled in the study
Preparing for the Inspection

• Admin oversight – pulling team together and addressing risk and resources

• Determine primary players
  ➢ PI - availability
  ➢ PI admin staff
  ➢ Management
  ➢ Coordinators
  ➢ Regulatory staff
  ➢ Pharmacy staff

• Determine staff education “all hands on deck for audit”

• Assess workloads and shifting of responsibilities to address audit
Preparing for the Inspection

Meet with the PI, review:

• Study – logistics, protocol amendments
• Enrollment metrics and timelines
• Deviations
• SAEs
• Need of securing time to meet with auditor each day
Preparing for the Inspection

• Update the Principal Investigator’s CV. This should include a list of all current studies.

• Review study documentation for:
  ➢ Comprehensiveness, accuracy, and compliance
  ➢ Weakness/gaps; correct those that can be corrected (i.e. file violations, notes-to-file, locate missing documents, etc.)
  ➢ Unresolved or outstanding issues
Preparing for the Inspection

Schedule a call with the sponsor to discuss:

• Will support will be provided
• Are other sites currently being audited
  ➢ What are the areas of focus
  ➢ What have been the timelines
  ➢ Who was/is the auditor
During the Inspection

• FDA inspector may request a tour of the facility where research took place.

• Escort should accompany the inspector at all times.

• Upon request, provide the inspector only with files that have been requested.
During the Inspection

If the inspector requests copies of documents:

• Remove subject identifiers from the copies given to the inspector
• Make a copy for yourself
• The inspector’s copies should be stamped ‘Confidential’ and your copies should be stamped ‘Copy.’
During the Inspection

How to answer questions from the inspector:

- Be concise; answer only the question that is asked
- Always be clear with answers to questions
- Answer honestly and openly
- DO NOT volunteer information
- DO NOT guess or speculate
- DO NOT argue
- If you don’t know the answer, write down the question and refer it to the appropriate person
- Keep a log of questions asked by the inspector
During the Inspection

FDA Inspector will verify:

• Who performed various aspects of the protocol (eligibility, consenting, etc.)
• The degree of delegation of authority
• Where specific aspects of the investigation were performed
• How and where data were recorded
• How were study staff oriented/trained on the protocol and investigational product
• That the PI followed the study protocol approved by the IRB
During the Inspection

The inspector will verify timelines:

- Dates of IRB approvals (original, continuing review, etc.)
- When the first subject was screened
- When the first subject was consented
- First administration of the investigational product
- Last follow-up for any study subject
Inspected Documents

The following items are routinely examined:

- IRB communication
- Investigational product accountability documentation
- Study protocol compliance
- Deviation documentation - IRB and sponsor approval/notification
- Delegation of Authority logs – study training
Inspected Documents

Inspected documents

• Appropriateness of the informed consent process
• Prompt and complete reporting of adverse events to the IRB and sponsor
• Compliance with record retention requirements
• Adequate monitoring of the site and communication of the sponsor (monitoring reports)
• Consent Forms (including the consent process)
After the Inspection

• The FDA inspector will hold an exit interview at the conclusion of the audit to discuss findings and deficiencies

• Study staff should document the interview, specifically noting observations, comments, and commitments

• Any deficiencies will be noted on the FDA form 483 and given to the PI

  ➢ PI can respond to the 483 verbally during the exit interview and/or in writing
After the Inspection – Lessons Learned

• Know your regulations and be able to speak to the regs in a non-confrontational manner
• Review consent process
• Ensure reconsenting is carried out in a timely manner
• Review investigational product accountability
• Coach staff to ensure audit readiness
• Free up management to support the team
• Be careful with unique study designs making operations more efficient
• Be ready for the FDA if you are a top enroller